

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Connect America Fund)	WC Docket 10-90
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Developing a Unified Inter-carrier Compensation Regime)	CC Docket No. 01-92
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Link-Up)	WC Docket No. 03-109

**COMMENTS OF
ADHOC TELECOMMUNICATIONS USERS COMMITTEE**

Susan M. Gately
SMGately Consulting, LLC
84 Littles Ave,
Pembroke, MA 02359
(617) 598-2223

Dr. Lee L. Selwyn
Economics and Technology, Inc.
One Washington Mall, 15th Floor
Boston, MA 02108
(617) 598-2223

Economic Consultant

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James S. Blaszk
Colleen Boothby
Andrew Brown
Levine, Blaszk, Block & Boothby, LLP
2001 L Street, NW, Suite 900
Washington, D.C. 20036
202-857-2550

Counsel for AdHoc Telecommunications
Users Committee

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SUMMARY

Fundamental reform of the FCC's High Cost Fund and inter-carrier compensation mechanisms is long overdue. If the Commission fails to adopt fundamental reforms in this rulemaking, high cost support will continue to be used wastefully and ineffectively, funding support for deployment of Broadband through the Connect America Fund (CAF) will cost taxpayers far more than necessary, and the economic waste and false price signals caused by the current hodge-podge of inter-carrier compensation mechanisms will continue unabated. By adopting meaningful reforms in this rulemaking, the Commission can more effectively achieve the programs' stated objectives with less economic loss while the business customers who support these programs to can invest the savings in facilities and job creation.

The Universal Service Fund (USF) has grown at an unsustainable rate and the USF contribution factor has risen steeply and, on a quarter by quarter basis, unpredictably. Unless the Commission fundamentally reforms the mechanisms for disbursement of USF funds and the methodology for funding the program's overall objectives, these trends will continue. The Commission's acknowledgement in the *Notice* of the need to impose fiscal restraint and accountability on the High Cost Fund is encouraging; however, the failure to address the current methodology used to calculate UCF contributions leaves completely unresolved half of the problem confronting current funding of the High Cost Fund and future funding of the CAF.

Ad Hoc supports many of the Commission's proposals for near term changes to the High Cost Fund. These changes would arrest the seemingly never-ending growth of the High Cost Fund and free-up subsidy money to support deployment of Broadband to

unserved parts of our country where the money could be more effectively spent than it is through current support programs. Specifically, Ad Hoc supports (1) elimination of local switching support in 2012, (2) lowering High Cost Loop Support for top tier carriers, (3) elimination of support of corporate overhead expense, (4) imposition of a rebuttable per line cap on all forms of high cost support and eventual use of a forward-looking economic cost model to set the cap, (5) re-examination of the rate of return, currently 11.25%, used to set the rebuttable per line cap, (6) cancelation of IAS in 2012 and (7) rescission of the identical support rule. Ad Hoc also suggests that the Commission reduce a carrier's per line costs by the difference between the average revenue per line and that carrier's per line revenue if lower than the average per line revenue. All of these measures would reduce subsidy amounts that carriers have failed to show are necessary to maintain Universal Service. Savings from subsidy reduction can be used to help fund the CAF and deliver broadband to unserved areas.

In crafting rules and policies for the future, the Commission should avoid past mistakes that have cost tens of billions of dollars but yielded little increase in telephone subscribership levels, resulting in a bloated and woefully inefficient High Cost Fund. Prior to issuance of the *Notice*, the Commission had largely failed to ask, let alone determine, whether the various subsidy mechanisms of the High Cost Fund have been cost-effective or necessary to advance the goals of section 254. Rather than focus the program on the preservation and maintenance of revenue streams for traditional USF recipients, the Commission should instead ensure that subsidies are sufficient to bring broadband to customers in unserved areas. Ad Hoc supports the use of reverse auctions to achieve that objective provided that the Commission concludes it has the

legal authority to award CAF subsidies to entities that may provide broadband but not telecommunications. If the Commission is not able to award subsidies to entities that provide services other than telecommunications, the reverse auctions may not attract enough participants to make them sufficiently competitive to effectively govern the levels of CAF subsidies.

Ad Hoc supports, and has consistently supported, adoption of a single, economically rational intercarrier compensation (“ICC”) regime. Carriers currently pay each other vastly different rates under multiple regulatory regimes for using the same local exchange networks to obtain services that are functionally the same. This situation is economically irrational and distorts investment and purchase decisions which produces an economic loss that harms buyers of telecommunications goods and services and the country more generally.

The Commission should resist carrier demands for reform that is “revenue neutral.” The carriers have never proffered a showing that their existing revenue streams are unreasonably low. No doubt many carriers, particularly rural LECs, derive a material portion of their revenues from access charges and universal service payments. That fact alone is not a justification for guaranteeing the same revenue stream under a revised ICC regime, without regard to a carrier’s actual costs and profits. Rates under any reformed ICC regime must still be just and reasonable under the Communications Act which means they cannot be excessive.

With regard to the Commission’s specific proposals for changing the current ICC regime, Ad Hoc supports adoption of a “bill and keep” system so long as the Commission replaces today’s “sender pays” retail rate structure with a “both parties pay”

approach to align retail and wholesale pricing. Ad Hoc supports proposals to include carrier revenues from both regulated and non-regulated services when the Commission evaluates carrier eligibility for any revenue recovery scheme because both services use the same network facilities but facility costs have been disproportionately allocated to regulated services. The Commission should also develop rate benchmarks and impute benchmark revenue to carriers seeking eligibility for revenue recovery schemes. The Commission should not fund any revenue recovery scheme with SLC increases because non-cost-based SLC increases are inherently inconsistent with the nature and structure of SLCs, violate statutory mandates against implicit subsidies, and would overburden end users with material rate increases, Nor should revenue recovery be funded with payments from the CAF funds. The CAF should be pointed strategically at specific broadband build-out objectives to ensure that funds are used for broadband deployment, not used as a slush fund for under-performing carriers.

Finally, if the Commission adopts a “fresh look” approach to enable carriers to reflect ICC reforms in their for existing contracts, it should do so only on a symmetrical basis, meaning that both service providers and their customers (whether wholesale or end user) should have the same “fresh look” rights.

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Comments

The Ad Hoc Telecommunications Users Committee (“Ad Hoc”) hereby submits its Comments in response to the Commission’s February 9, 2011 Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking in the above-captioned proceedings.¹

Ad Hoc has long called for fundamental reform of (1) the high cost component (“High Cost Fund”) of the Universal Service Fund (“USF”), (2) the methodology used to calculate contributions to the USF and (3) inter-carrier compensation payment mechanisms. Changes in Commission leadership and other matters, such as

¹ Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, FCC 11-13, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, GN Docket No. 09-51, CC Docket Nos. 01-92, 96-45, released: February 9, 2011 (the “Notice”).

applications seeking Commission approval of mergers and acquisitions, seem, however, to push these matters off the Commission's front burner. In the meantime, the High Cost Fund has grown from \$1.7 billion in 1998 to about \$4.3 billion in 2010, and the interstate USF factor has soared from 3.2% in 1998 to as high as 15.5% in the first quarter of 2011. Business customers have come to view growth in the High Cost Fund and an ever-escalating interstate USF surcharge as almost inevitable while seriously questioning the fund's utility as currently structured and overseen. Moreover, as noted by the Commission, the telecommunications network is being transformed into an IP network with cost characteristics different from the TDM network on which the High Cost Fund and current inter-carrier compensation mechanisms are predicated. While the foregoing alone provide good reason to reform the High Cost Fund and inter-carrier compensation policies, and while the Commission previously has started to address deficiencies in the High Cost Fund and inter-carrier compensation mechanisms, it has failed to finish the job. The time for fundamental reform is past due.

I. High Cost Fund Reform

A. The Commission Should Seek to Minimize Economic Loss in Designing and Supervising the Universal Service Fund and the Successor Connect America Fund.

Although the courts have ruled that the interstate USF surcharge is not a tax,² the USF surcharge produces economic effects similar, or identical, to a tax. It takes money out of the private sector economy and redirects that money to support government programs and objectives. The interstate USF surcharges that businesses pay to telecommunications carriers, who then use that money to make payments to the

² See *Texas Office of Public Utility Counsel v. FCC*, 183 F.3d 393, 428 (5th Cir. 1999).

USF, divert money that could be spent for other business purposes, including facility investment and job creation. Despite the incontrovertible burden attributable to the USF, and the High Cost Fund in particular, from Ad Hoc's perspective the issue in this proceeding is not whether there should be a High Cost Fund and successor Connect America Fund ("CAF"). Rather, the issue is whether the benefits of the High Cost Fund as currently specified, administered and supervised outweigh the economic loss that comes from taking money out of the economy through the interstate USF surcharge.

Although Congress, through Section 254 of the Communications Act, 47 U.S.C. § 254, has mandated that the Commission's universal service policies support certain objectives, Congress has not required that the Commission turn a blind eye to the economic loss that can occur as a result of a badly designed and managed USF. The *Notice* gives the Commission an opportunity to transform the USF and to design the Connect America Fund to better serve the objectives specified by Congress, while producing less economic loss, certainly far less than caused by the current High Cost Fund.

1. Does The High Cost Fund Cost Too Much?

Has the High Cost Fund grown larger than it need be to advance statutorily mandated objectives? Several pieces of data strongly suggest that the answer is "yes." There are various estimates of how much of high cost support goes to general phone company overhead, but all produce a high number. The *Notice* acknowledges that the "GAO found inconsistencies in the certification process among states and questioned whether such certifications enabled program administrators to fully assess whether

carriers are appropriately using high-cost program support.”³ Excessive overhead and possible improper use of High Cost Fund support may partially explain why the monthly cost per household to support the High Cost Fund has increased by over 50%, adjusted for inflation, between 2000 and 2010,⁴ even though the Commission has recognized that the local exchange carriers’ costs rise significantly more slowly than economy wide measures of inflation.⁵ In 2010 RLECs on average received \$29.04 per line per month of high cost subsidy,⁶ almost twice as much as the nationwide average urban local service rate,⁷ but charged *on average* only about 90 percent of the average urban rate.⁸ In a long overdue but entirely accurate observation, the Commission notes that the current mechanisms that provide high cost support to RLECs “[o]ften do not provide incentives for controlling capital and operating costs” and “[s]upport is not distributed among high-cost carriers in a way that maximizes overall consumer benefit[.]”⁹

2. What Public Benefit has the High Cost Fund Produced?

In light of its substantial costs, what benefits has the High Cost Fund produced? Landline telephone penetration service levels have not increased materially since the inception of the USF. In 1998 the landline telephone penetration level was 94.1 percent. In 2010 the penetration level was 95.2 percent. During this period, the Universal Service Administrative Company distributed approximately \$42.8 billion from

³ Notice ¶ 475.

⁴ *Id.* ¶ 487.

⁵ See *Policy and Rules Concerning Rates for Dominant Carriers*, CC Docket No. 87-313, Second Report and Order, 5 FCC Rcd. 6786, 6796 - 6801 (1990) (*LEC Price Cap Order*) and Erratum, 5 FCC Rcd. 7664 (1990), *mod. by Order on Reconsideration*, 6 FCC Rcd. 2637 (1991) and 47 C.F.R. § 61.45.

⁶ Notice ¶ 166, Figure 6.

⁷ *Id.* ¶ 172.

⁸ *Id.* n.270.

⁹ *Id.* ¶ 162.

the High Cost Fund. By itself, the foregoing should at least raise serious concern about the cost efficacy of the current high cost program.¹⁰

The evaluation is, however, not so simple. Conventional switched access lines actually decreased by eight percent between June 2009 and June 2010.¹¹ While conventional switched access lines declined, subscribership to interconnected VoIP and wireless service increased. Twenty-eight percent of residential wireline connections were interconnected VoIP as of June 2010. While conventional wireline connections barely increased from 1998 to 2008, wireless subscribers jumped from about 69 million to over 270 million.¹² Would interconnected VoIP and wireless service have grown so dramatically without high cost subsidies? Non-LEC VoIP providers, such as cable television companies, do not currently receive USF subsidies. To the extent rural local exchange carriers (RLECs) offer VoIP service, such carriers almost certainly do so over plant that may be subsidized. Wireless carriers also qualify for high cost subsidies, but only, of course, in high cost areas.¹³ Growth in interconnected VoIP and wireless connections and a decline in conventional switched access lines might have occurred without High Cost Fund subsidies, but perhaps not. What would have happened to RLEC rates for local service if they confronted competition from alternative technologies

¹⁰ The cost effectiveness of the program is even more open to question when low income program expenditures are also considered. During the same ten year period, \$8.8 billion of low income subsidies have been distributed from the USF. See Tables SMG-1 and -2, Declaration of Susan M. Gately ("Gately Declaration") attached as Appendix A to these Comments.

¹¹ Industry Analysis and Technology Division, Wireline Competition Bureau, *Local Telephone Competition: Status as of June 30, 2010* at 2 (Mar. 2011).

¹² Industry Analysis and Technology Division, Wireline Competition Bureau, *Trends in Telephone Service ("Trends in Telephone Service")*, Table 11.1 (Sept. 2010).

¹³ Wireless carriers can also receive USF money from the low income program. Ad Hoc does not have the data needed to determine how much of the wireless growth has occurred in urban versus rural areas.

without the same level of High Cost Fund subsidization? Would RLEC rates have increased? Would the RLECs have become more efficient and not raised rates? Or would RLECs have accepted lower profit margins in addition to becoming more efficient?

The failure of public policy makers to answer – or even ask – the foregoing questions would suggest that they may not know whether the benefits produced by the High Cost Fund justify the program's cost. Could similar benefits have been produced at a lower cost?

It seems an uncontroversial principle that statutory goals should be achieved at the lowest possible cost. If one mechanism makes American consumers just as well off as another, more expensive mechanism, the public's interest lies in having the Commission implement the cheaper option. To be sure, a specific statutory mandate ... may constrain the FCC's discretion. But the Commission should choose the most economically efficient subsidy mechanism so long as doing so does not contradict other policy goals.¹⁴

The Government Accountability Office (GAO) observed that,

[P]rior GAO reports indicate that best practices include developing goals and measures that address important dimensions of program performance, developing intermediate goals and measures, and developing goals to address mission-critical management problems. Yet, FCC has not established long-term or intermediate performance goals and measures. Additionally, OMB noted that performance measures should reflect desired outcomes, which describe the intended results of the program [High Cost Fund]. Yet, FCC data collection efforts focus on program outputs, such as the number of requests for support payments, which describe the level of activity.¹⁵

¹⁴ Jerry Hausman and Howard Shelanski, *Economic Welfare and Telecommunications Regulation: The E-Rate Policy for Universal-Service Subsidies*, 16 Yale J. on Reg. 19, 33 (1999).

¹⁵ U.S. Government Accountability Office, *Telecommunications: FCC Needs to Improve Performance Management and Strengthen Oversight of the High-Cost Program*, GAO-08-633 at 5 (June 2008).

Outcomes are not what the program did, but are the consequences of what the program did.¹⁶ To the best of Ad Hoc's knowledge, the FCC has never critically assessed the *outcomes* produced by the High Cost Fund compared to its costs.

Although Ad Hoc does not dispute the need for a high cost support program, it does submit that in light of the foregoing, the Commission should not start with the assumption that the public interest would be well-served by merely capping high cost support at the current level. Instead, and as detailed below, the Commission should make changes to the High Cost Fund and direct any savings to short-term CAF efforts. For the longer term, Ad Hoc supports use of a well-designed reverse auction mechanism – an approach far more likely to allocate CAF support efficiently than the High Cost Fund rules.

B. Vigilance

As it transitions from the existing High Cost Fund mechanisms to implementation of the CAF, the Commission should exercise a level of fiscal responsibility that has heretofore been missing. The Commission certainly has tried to control growth in specific components of the fund (e.g., capping the IAS fund and CETC support). It is fair to say that such measures have been taken to “keep matters from getting worse.” The Commission's efforts must be put in economic context. All available evidence suggests that over the last decade, the High Cost Fund certainly should not have

¹⁶ *Performance Measures for the High Cost Universal Service Fund: Hearing titled “Universal Service: Reforming the High-Cost Fund” Before the H. Comm. on Energy and Commerce Subcommittee on Communications, Technology and the Internet*, 111th Cong. 2 (Mar. 12, 2009) (written testimony of Jerry Ellig, Ph.D., Senior Research Fellow, Mercatus Center at George Mason University) quoting Harry Hatry, Urban Institute, *Performance Measurement: Getting Results* (1999) at 15.

increased by over 200 percent.¹⁷ Technology and material costs have dropped¹⁸, the number of employees required per telephone line has dropped¹⁹ and the average revenue derived per subscriber has increased.²⁰ As costs drop at the same time that per customer revenues increase, the amount of subsidization required to ensure universal service should have steadily declined.

If High Cost Fund subsidy recipients experienced the same economic dynamics as the rest of the communications industry, then some large portion of the subsidy flowing to them has been unnecessary. If high cost carriers have not experienced the same economic dynamic as the rest of the communications industry then the fault may be largely attributable to High Cost Fund subsidies that have insulated them from the need to operate more efficiently. In either case more subsidy dollars have been collected and distributed than were necessary.

Areas in which a non-subsidized competitor is offering service, be it by traditional wireline, VoIP, or wireless technology, do not, by definition, need subsidization to ensure universal service. The USF should not be used to prop up high cost providers in areas where lower cost providers are already operating without subsidization.

Oversight of the CAF should include critical review of the *necessity* of any subsidies.

The Commission should become vigilant of *need*.

A communications platform that delivered only voice service may have required more subsidization than a platform capable of providing a combination of voice, data, video and/or mobility. Cable companies have been able to deploy video, high speed

¹⁷ See Gately Declaration, Table SMG-1.

¹⁸ *Id.* ¶ 7 and Exhibit SMG-1.

¹⁹ *Id.* ¶ 7 and Exhibit SMG-2.

²⁰ *Id.* ¶ 8 and Exhibit SMG-3.

internet and voice networks without High Cost Fund subsidies because they offer a broad range of services. All available revenues from all services associated with subsidized plant should be accounted for in determining the need for subsidization.

Oversight of subsidization programs, such as the High Cost Fund and the CAF also should account for corporate structures. For example, a single holding company may own both the wireline and the wireless service operating in a high cost study area. Since the USF rules have not evolved to account for joint ownership, the current High Cost Fund program rewards both the wireline and wireless operator of the same corporate parent each time a wireline customer “cuts the cord.”²¹ The loss of a wireline customer to the firm’s wireless affiliate does not reduce an RLEC’s overall subscriber plant costs (the investment associated with the loops and ports is still in place), but it does reduce the amount of SLC revenue received, automatically increasing the RLEC’s ICLS subsidy (and the average per line disbursement used to determine the wireless carrier’s “identical support”). The wireless carrier, having picked up the customer that “cut the cord,” gets the ICLS identical support for that line, and then also gets a bump up in the identical support it is due for each and every other wireless line it sells in its territory. Bonanza! For those carriers operating in high cost study areas and owning both a wireline and wireless provider, the ICLS guarantees that the decision of an individual subscriber to replace a wireline phone with a wireless phone from the same

²¹ Our data analysis for this project uncovered an RLEC with a wireless affiliate in which the RLEC’s wireline offering was priced at \$40 per month while its wireless affiliate was offering an unlimited wireless voice, texting and internet access service for \$20 per month. Not surprisingly, the carrier’s wireless lines have been showing steady growth while the wirelines have been declining and overall ICLS disbursements to the two divisions of the same company have increased significantly. See discussion and references to data sources for Adak Eagle Enterprises, the Adak Telephone Utility and Windy City Cellular in the Gately Declaration ¶ 10 and Exhibits 6 through 12.

company results in that ICLS disbursement associated with that one connection growing to more than twice what the wireline carrier was originally receiving. An attitude of critical vigilance in designing and supervising the CAF can help guard against this kind of perverse situation.

II. The Commission Should Promptly Reform the USF Contribution Methodology.

The *Notice* does not propose any changes to the methodology used to set USF contribution obligations. The Commission should, however, address in the near term the problems inherent in the current contribution methodology.

The interstate USF contribution factor continues to rise, with no limit in sight. The USF contribution factor was set at 3.2 percent in 1998. In the first quarter of 2011, the factor hit 15.5%, an all time high. The factor has rocketed up because the USF has grown while the revenue base used to compute the contribution factor has failed to keep pace. The current methodology for assessing USF contributions will make the USF and successor CAF unsustainable. Over the course of many years, Ad Hoc has urged the Commission to abandon the current methodology,²² and is disappointed that the *Notice* fails to seek comment on changes to the USF contribution assessment methodology.

Considering only changes that affect the size of the USF and the CAF is to consider only part of problem that plagues the universal service program. Currently

²² See, e.g., Reply Comments of Ad Hoc Telecommunications Users Committee on the NPRM, CC Docket No. 96-45 (filed June 25, 2001); Reply Comments of Ad Hoc Telecommunications Users Committee on the Second FNPRM, CC Docket No. 96-45 (filed April 18, 2003); Comments of Ad Hoc Telecommunications Users Committee on Appendices A, B and C to the November 5, 2008 Order on Remand and Report and Order and FNPRM, WC Docket No. 05-337 (filed Nov. 26, 2008); *Ex Parte* Submissions of Ad Hoc Telecommunications Users Committee in CC Docket No. 96-45 (filed Feb. 16, 2005 and Oct. 25, 2005); *Ex Parte* Submissions of Ad Hoc Telecommunications Users Committee in WC Docket No. 06-122 (filed Dec. 15, 2010).

providers of high speed Internet access service (broadband) do not contribute to the USF on revenues from that service. Nor do they receive USF funds, except to the extent that they use USF subsidies to build and support telecommunications plant that is also used for broadband. If the Commission opts to use reverse auctions to award CAF funds, it must conclude that it has the legal authority to award CAF funds to entities who are not telecommunications carriers but who provide broadband, despite the fact that it has not found broadband to be telecommunications.²³ Otherwise the level of competition in reverse auctions may be insufficient to produce robust auctions and good results. If providers of broadband will be eligible to receive USF support, then they should be required to also contribute to the USF. The basis for contributions to the USF is a matter to be addressed either in a Further Notice of Proposed Rulemaking or a substantive decision based on an already fully developed record on the subject.

The current Commission can do what recent previous Commissions failed to do, i.e., reform the USF and the successor CAF in a way that requires equitable contributions from providers of telecommunications and broadband and that provides a specific, predictable and sufficient funding source for supported services.²⁴

III. Near Term Reforms to the High Cost Fund

The High Cost Fund has become bloated. The Commission needs to intervene by making short term corrections that should free up substantial support for deploying

²³ Section 254(e) of the Communications Act states in relevant part that, “[o]nly an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific Federal universal service support.” 47 U.S.C. § 254(e).

²⁴ See 47 U.S.C. § 254(b); record in CC Docket No. 96-45, WC Docket No. 05-337 and WC Docket No. 06-122.

broadband to unserved areas of the country. The corrections suggested below will not jeopardize basic services nor drive rates to unaffordable levels.

A. The Commission Should Eliminate Local Switching Support.

Ad Hoc supports the Commission's proposal to eliminate subsidies for the Local Switching Support (LSS) portion of the existing High Cost Fund.²⁵ As the Commission makes abundantly clear in the *Notice*, the need that the LSS funding was designed to fulfill no longer exists,²⁶ and the LSS funding mechanism provides a disincentive for those carriers identified as rural under the Commission's rules and owning multiple study areas in the same state to combine those study areas, potentially resulting in inefficient, costly deployment of resources.²⁷ Moreover, as others have documented in prior reviews of the high cost funding mechanisms, LSS provides a very real disincentive to consolidation for those small carriers that might otherwise find it beneficial to merge operations.²⁸

As discussed below, there is no evidence to support the notion that elimination of the existing LSS funding levels will in any way endanger any of the statutory universal service goals. Nor is there any evidence that the carriers receiving LSS support are in fact "high cost" carriers or, even more importantly, that they exhibit costs so much

²⁵ *Notice* ¶ 186.

²⁶ *Id.* ¶ 187.

²⁷ *Id.* ¶ 188.

²⁸ Susan M. Gately and Scott C. Lundquist, Economics and Technology, Inc., *Lost in Translation: How Rate of Return Regulation Transformed the Universal Service Fund for Consumers into Corporate Welfare for the RLECs*, (Boston, MA, Feb. 2004) (the "Gately / Lundquist Study"), Appendix A to the Reply Comments of Western Wireless, Elimination of Rate of Return Regulation of Incumbent Local Carriers, CC Docket No. 96-45 (filed Feb. 13, 2004).

higher than the norm that subsidization is required for service to continue to be available on an affordable basis.

AdHoc urges the Commission to eliminate the LSS funding mechanism (redirecting the dollars to the CAF) rather than adopting its alternate proposal to “combine LSS and HCLS into one high-cost mechanism.”²⁹ The Commission is correct in recognizing that “support should flow to areas with above-average costs” and observing that the alternate proposal for a combined HCLS / LSS would at least target funds to “high cost” areas,³⁰ but is not clear that the alternate proposal would be an improvement over the existing treatment of LSS. The alternate proposal would direct additional funds to high cost areas simply because those areas exhibit or report high costs, rather than because the funding is required to guarantee either Section 254 goals or broadband deployment. As discussed in Section I *supra*, every dollar collected through USF surcharges is a dollar not available for use elsewhere in the US economy.

It would be inexcusable, and an opportunity missed, if this proceeding recodifies the inefficiencies of the existing High Cost Fund funding mechanisms into new components with different names and different formulas. The Commission should focus on identifying areas of the existing programs (such as LSS) that are not necessary to achieve universal service. If the Commission is to meet its goal of having \$500 million to \$1 billion in CAF funds to deploy in 2012³¹ it should eliminate LSS and transfer those

²⁹ Notice ¶¶ 191-193.

³⁰ Notice ¶ 191.

³¹ Notice ¶ 24.

dollars to the CAF. As the examples below illustrate, LSS should be eliminated completely in 2012, not phased-out over a two or three year period.³²

In response to its request for recipients of LSS funds to “provide information on the types of switching equipment currently employed, including dates placed in service, and information on the remaining depreciable life of such equipment,”³³ the Commission will undoubtedly see a wide range of equipment types and remaining lives of equipment. But data on how new, how expensive and how undepreciated an individual carrier’s local switching plant may be will not inform the record on how *necessary* or *unnecessary* that investment may have been or whether LSS dollars are now needed to ensure the continued provision of reasonable voice service at reasonably comparable rates.

Ad Hoc’s review of RLEC data, including central office switching costs and other data potentially relevant to a carrier’s need for LSS, supports transferring High Cost Fund LSS subsidies to the CAF. As an example, the traffic patterns of some RLECs at least raise the question of whether carriers who may have been participants in “access stimulation,” “traffic pumping” and creating “phantom traffic” have received LSS money.³⁴ Looking just at traffic patterns for the state of Iowa, we identified five RLECs whose interstate access minutes increased at least five fold in a single year during the review period (2005 to 2009) – all of whom continued to receive LSS revenue during the same period, and all of whom continue to receive such funding today.

³² See *Notice* ¶ 190 where the Commission queries whether it should transition the plan over a period of perhaps three years or require RLECs to combine study areas in the same state for purposes of qualifying for LSS funds. The three year phase-down is also found in the proposed rule change in Appendix A of the *Notice*.

³³ *Notice* ¶ 190.

³⁴ See Gately Declaration ¶ 9 and Exhibits SMG-4 and -5.

- Dixon Telephone Company (351150): Traffic increased from 30 million to 202 million minutes from 2005 to 2006. Projected 2011 LSS funding: \$35,000.
- Farmers and Merchants Mutual Telephone (351166): Traffic increased from 33 million to 215 million minutes from 2005 to 2006. Projected 2011 LSS funding: \$45,000.
- Farmers Telephone Company – Rice (351177): Traffic increased from 27 million to 202 million minutes from 2005 to 2006. Projected 2011 LSS funding: \$97,000.
- Interstate 35 Telephone Company (351209): Traffic increased from 40 million to 242 million minutes from 2005 to 2006. Projected 2011 LSS funding: \$290,000.
- Superior Telephone Company (351307): Traffic increased from 0.5 million to 58 million minutes from 2005 to 2006. Projected 2011 LSS funding: \$25,000.

The incremental switched access revenue generated from just the period of rapid access traffic growth alone should have negated the need for any high cost fund subsidy, including LSS.

Another striking example is the Adak Telephone Utility (610989) in Adak, Alaska (analyzed because it is the first company on the USAC LSS reporting spreadsheet). The Adak Telephone Utility is a new ILEC established in 2003 and owned by Adak Eagle Enterprises (AEE).³⁵ Adak Telephone Utility reported having 167 working loops and LSS receipts for 2010 of \$479,040.³⁶ USAC reports LSS disbursements from February 2006 (the first month Adak was eligible for LSS funds) through February 2011 of \$2,067,576 to the Adak Telephone Utility.³⁷ Another \$151,645 in LSS receipts for 2010 and the first two months of 2011 for Windy City Cellular (619012) should be added to the Adak LSS subsidy³⁸ because Windy City operates in the same geographic

³⁵ Gately Declaration Exhibit SMG-6

³⁶ See Gately Declaration ¶ 10 and Exhibits SMG-7 and -8.

³⁷ *Id.* ¶ 10 and Exhibit SMG-8.

³⁸ *Id.* Exhibit SMG-9. It is worth noting that at its present disbursement rate, and assuming it doesn't gain any additional wireless subscribers during the remainder of

territory and is owned by the same parent corporation, AEE (and likely utilizes the same switch).³⁹ That brings the total LSS funding flowing to Adak for a total of less than 300 lines to \$2.2 million over a five year period. Given current technology costs, there is no logical explanation (the total population in Adak is in the range of 300)⁴⁰ for LSS of this magnitude. Indeed, the total capital and operating costs for a switch that should be engineered to handle 500 lines or less should be less than the LSS. In fact Adak Telephone Utility's entire Central Office Switching Investment appears to be less than \$800,000 – and while that number in and of itself seems extreme for a new generation switch of the size that would be required to serve the approximately 300 citizens of Adak,⁴¹ more troubling is the fact that the investment has been recovered almost three times over in high cost LSS disbursements over the past five years.

To gain additional insight into the LSS funding mechanism we chose four separate RLECs from the same state (Arizona) with similar Category 1.3 loop counts to see what kind of consistency, if any, existed in their reported Central Office Switching expense and investment levels and their LSS disbursements as reported for 2009.

2011, Windy City is on target to receive \$296,232 in LSS support in 2011. Windy City offers an “emergency” service for \$10 per month, unlimited wireless service (including voice, texts, and data) for \$20.00 per month (roaming limited to 200 minutes per month) and a lifeline service (\$28.50 per month subsidy) with unlimited voice, text and data service with 600 roaming minutes per month for a net price \$1.50. Gately Declaration Exhibit SMG-10.

³⁹ Gately Declaration Exhibit SMG-6

⁴⁰ According to the US Census, the total population in Adak was 319 in 2000 and 326 in 2010. See *Alaska Community Databases, Community Information Summaries (CIS): Adak*, ALASKA DIVISION OF COMMUNITY AND REGIONAL AFFAIRS, www.commerce.state.ak.us/dca/commdb/cis.cfm?Comm_Boro_Name=Adak (last visited April 18, 2011).

⁴¹ AEE reports that it purchased a T7000 switch in 2006 and while it does not provide pricing information on that switch, another RLEC, Palmer Mutual Telephone Company in Iowa, reported purchasing a T7000 in December 2005 for \$160,000. Gately Declaration Exhibit SMG-12.

Loop counts ranged from 3,295 to 4,030 and the LSS disbursement per loop ranged from \$41.57 to \$111.47. In short, no pattern or consistency could be seen: switch investment ranged from \$2 million to more than \$4 million, the annual amortization and depreciation expense associated with those switching investments ranged from 2.8% to 18.4% of the plant value, and the reported annual operating expense associated with the switching plant ranged from a low of \$121,557 to a high of \$893,486. Valid explanations may exist for the wide range of results – but regardless of the explanations, the wide variations in costs for similarly situated providers offering an identical function (switching) reasonably raises the question of whether there is “need” for LSS high cost support in this case. The results of the comparisons are in the table below.

Analysis of COE Switching Investment, Depreciation Expense, Operating Expense and LSS Funding Draw for Four Similarly Sized Arizona Study Areas 2009 Data				
	Arizona Telephone Company (452171)	Tohono O'Odham Utility (452173)	Southwestern Telephone (452174)	Gila River (452179)
Category 1.3 Loop Count	3,295	3,925	3,629	4,030
COE Switching Plant in Service	\$4.2-mil	\$2.9-mil	\$2.1-mil	\$2.0-mil
COE Switching Annual Depreciation and Amortization Expense	\$228,730	\$146,735	\$ 59,360	\$ 370,271
COE Switching Dep and Amort. Expense as % of Investment	5.5%	5.1%	2.8%	18.4%
COE Switching Operating Expense	\$121,557	\$320,711	\$122,238	\$893,486
Operating Expense to Investment Ratio	2.9%	11.2%	5.8%	44.5%

2009 Local Switching Support Projected Disbursements	\$367,308	\$207,696	\$150,852	\$245,520
2009 LSS per Cat 1.3 Loop	\$111.47	\$52.92	\$41.57	\$60.92
For information source data, see Gately Declaration ¶ 11 and Exhibits SMG-13 and SMG-14.				

B. Reducing the Reimbursement Rates for the Current High Cost Loop Program

AdHoc supports that portion of the Commission's proposal for High Cost Loop Support (HCLS) that would reduce the reimbursement rates for the upper tiers of the reimbursement schedule.⁴² The Commission should transfer those funds immediately into the CAF for 2012. Directing the newly available funds to Broadband deployment makes far more economic sense than redistributing the newly available funds to other RLECs so that they are treated more “equitably” with respect to HCLS distribution.⁴³

The *Notice* reports that as a result of capping of the HCLS fund between 2007 and 2011 the number of RLECs receiving support through the HCLS mechanism dropped from 1,115 to 1,066.⁴⁴ The proposed revisions to the reimbursement percentages seem to be aimed at ensuring that no more carriers are dropped from the HCLS rolls, and that perhaps some carriers will be added.⁴⁵ Strikingly missing from the discussion (or evidence) is any indication that the reduction in HCLS funding available to those carriers with lower average costs per loop has in any way harmed the

⁴² *Notice* ¶ 175.

⁴³ *Id.* ¶ 180.

⁴⁴ *Id.* ¶ 179, Figure 11. The loss in funding to these carriers is at least in part the result of the use of a surrogate National Average Cost Per Loop (NACPL) of \$458.36 in place of the actual NACPL of \$423.15 that was required as a result of the cap. *Notice* ¶ 177. It is also likely true that some number of the carriers that lost funding did so because their average per line costs did not increase at the same phenomenal rate of almost 25% between 2007 (when the NACPL was \$340) to the \$424 2010 NACPL.

⁴⁵ See generally, *Notice* ¶¶ 175-182.

Commission's pre-existing or going-forward universal service goals. The *Notice* reports no evidence that the carriers who lost funding since 2007 have gone out of business, experienced financial hardship, reduced the quality of service, raised prices to unaffordable levels (or at all), or even that they had more or less broadband deployment than other carriers. It, instead, would appear that the loss of HCLS funds for the forty-nine carriers that lost funding since 2007 has not negatively affected universal service. The Commission should focus on making its universal service programs cost-effective and imposing reasonable fiscal constraints, not on maintaining revenue flows to carriers without apparent regard for whether the subsidies are needed to satisfy the goals set forth in Section 254 of the Act.

C. The Commission Should Eliminate Support for Corporate Operations Expenses

Ad Hoc supports the Commission's proposal to eliminate subsidies for corporate overhead which are currently received by eligible providers through HCLS, LSS, and ICLS.⁴⁶ Corporate operations and expenses have been traditionally subsidized by the fund without meaningful limits or appropriate incentives for recipients to reduce overhead expenses.⁴⁷ As a result, subsidization of corporate overhead expenses has

⁴⁶ *Notice* ¶ 198.

⁴⁷ Although the Commission capped the amount of corporate overhead expense that LECs could include in HCLS calculations, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 12 FCC Rcd. 8776 (1997) (subsequent history omitted) (*Universal Service First Report and Order*) at 8931 ¶¶ 283-85, subsequent adjustments to the cap by the Commission significantly reduced the effectiveness of the cap in reducing the amount of corporate overhead subsidized by the fund. See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers*, CC Docket No. 00-256, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45, and Report and Order

totaled more than \$1 billion over the last decade in HCLS disbursements alone,⁴⁸ and contributed significantly to the unsustainable growth of the fund. To provide needed money for the CAF, to gain some control over the High Cost Fund and to increase the odds of the subsidies being actually spent on making Broadband available in unserved areas,⁴⁹ the Commission should prohibit the use of High Cost Fund and CAF subsidies for corporate overhead and administrative expenses.

Ad Hoc has long supported *complete elimination* of subsidies for high cost providers' corporate overhead because such subsidies encourage wastefulness and inefficiency.⁵⁰ Studies indicate that on average RLEC spending is wasteful and inefficient by nearly every objective standard of measurement.⁵¹ Although precise figures may be difficult to calculate based on reporting methods and publicly available data, these estimates of RLEC overhead expenditures present the Commission with an astonishing picture. For example, the most recent analysis released in the Wallsten Study states that nearly 60% "of every dollar in high cost subsidies given to recipient ILECs goes to inflated overhead expenses."⁵² Ad Hoc's economists have estimated that RLECs as a whole reported corporate overhead expense levels in amounts that are

in CC Docket No. 00-256, 16 FCC Rcd. 11244, 11273 (2001). Furthermore, funds for corporate overhead available through ICLS and LSS have always remained uncapped.

⁴⁸ See Gately Declaration ¶ 12.

⁴⁹ Notice ¶ 10.

⁵⁰ *Federal State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 12 FCC Rcd. 8776 (May 8, 1997) (*Universal Service First Report and Order*) at 8931 & n.739 (citing the Comments by the Ad Hoc Telecommunications Users Committee advocating the elimination of recovery for corporate overhead).

⁵¹ See, e.g., the Gately / Lundquist Study at 37-40; Scott Wallsten, *The Universal Service Fund: What do High-Cost Subsidies Subsidize?* (Washington, DC: Technology Policy Institute, Feb. 2011) (the "Wallsten Study"); Thomas W. Hazlett, "*Universal Service*" Telephone Subsidies: *What Does \$7 Billion Buy?* (Jun. 2006) (the "Hazlett Study") at 29-33.

⁵² Wallsten Study at 15.

nearly 50% higher than the “benchmark” amount for such expenses when incurred by a reasonably efficiently-run RLEC.⁵³ Average RLEC corporate per line overhead expense is 33% higher than non-rural ILEC levels, and over one-third of rural telcos have corporate expenses that are 2.5 times greater than the already inflated RLEC average for such expenses.⁵⁴

Rural telcos apparently have taken few measures to improve efficiency in their operations or to reduce overhead expenditures because there is little, if any, incentive for them to do so. Over time, a significant portion of High Cost Fund dollars seems to have turned into a virtual slush fund for RLECs’ overhead.⁵⁵

The time is long past due for the Commission to eliminate this wasteful use of USF funds for expenses that inherently are not “high cost”⁵⁶ and that promote neither efficiency nor investment in facilities to provide or improve service to consumers in high cost areas. Although the cost of providing service in rural areas may be greater in rural areas than the cost of providing equivalent service in suburban or urban areas, the cost of managing network assets and corporate activities (expenses for which universal funds can be applied for high cost providers),⁵⁷ are not significantly higher, if at all higher, in rural areas as they are mostly unrelated to the actual provisioning of service.

⁵³ Gately / Lundquist Study at 40-41 & n.89.

⁵⁴ Hazlett Study at 31.

⁵⁵ See Gately / Lundquist Study, “Chapter 7: Case Study Profiles,” at 61-69.

⁵⁶ Hazlett Study at 29.

⁵⁷ High cost recipients are entitled to seek support for expenses incurred for “general and administrative services” which include: formulation of corporate policies; salaries for directors, executives, and their staffs; accounting and financial services; government and public relations, legal services, office supplies, and other general administrative activities not directly charged to the end-user (such as company cafeterias). 47 C.F.R. § 32.6720. None of these expenses, of course, bears any direct relation to the cost of provisioning telecommunications service in high cost areas.

Indeed, the Commission itself has already stated that corporate overhead expenses are not related to the cost of providing services but, rather, result from “managerial priorities and discretionary spending.”⁵⁸ Nearly fifteen years after such acknowledgment, the need to eliminate the wasteful use of High Cost Fund dollars for misguided managerial priorities and inefficient and wasteful discretionary spending has only increased given the astonishing expansion in the size of the fund, the increased burden imposed on consumers of telecommunications services caused by a dramatically higher USF contribution factor, and the Commission’s recent commitment to fiscal responsibility that underlies current USF reform efforts.

Elimination of subsidies for corporate overhead could achieve immediate savings and have a notable impact on funds available for the CAF. Current estimates for the cost of subsidizing corporate overhead expenses run as high as half a billion dollars.⁵⁹ At a time when the Commission is charged with a pressing national priority to expand broadband, eliminating blatant waste and inefficiency in the use of High Cost Fund and CAF support should be a Commission priority.

D. The Commission Should Adopt a Rebuttable Per Line Cap on *All* Forms of High Cost Support.

Ad Hoc supports the Commission’s proposal to impose a rebuttable per line cap on total USF support.⁶⁰ Use of embedded costs to calculate disbursement of High Cost Fund support without effective oversight of LEC expenditures has materially contributed

⁵⁸ Notice ¶ 197, citing *Universal Service First Report and Order* at 8930.

⁵⁹ Gately Declaration ¶ 12.

⁶⁰ Notice ¶ 208.

to the growth of the High Cost Fund.⁶¹ LECs have strong incentives to inflate their “costs” – as opposed to managing them downward like any other small business – because additional costs generate additional High Cost Fund subsidies.⁶² The Commission, however, cannot rigorously review the expenditures of rural LECs. There are too many of them, and the Commission’s resources already are stretched thin. Adoption of a rebuttable per line cap, as proposed by the Commission in the *Notice*, would be a cost-effective way of ameliorating the perverse incentives caused by the current method of determining eligibility for high cost support and the amount of the subsidies without wide scale review of the reasonableness of the costs incurred by rate of return regulated carriers. As a practical matter, the cap would reduce the Commission’s oversight effort, limit growth of the High Cost Fund and permit any High Cost Fund recipient that reasonably incurs actual costs to provide service that exceed the cap an opportunity to carry the burden of rebutting the presumption that the capped per line support provides adequate High Cost Fund subsidization.⁶³

⁶¹ As the Commission itself observed *nearly fifteen years ago* regarding use of the embedded cost standard, “[c]urrent support mechanisms neither ensure that ILECs are operating efficiently nor encourage them to do so” and “effectively discourage efficiency.” *Universal Service First Report and Order* at 8935. In addition, the Commission has noted that, “[c]alculating high cost support based on embedded cost is contrary to sound economic policy.” *Id.*

⁶² Ad Hoc has, on prior occasions, cautioned the Commission against continuing discredited disbursement methodologies that encourage RLEC inefficiency. See Comments of the Ad Hoc Telecommunications Users Committee on the Petition for Rulemaking to Eliminate Rate-Of-Return Regulation of Incumbent Local Exchange Carriers by Western Wireless Corporation, CC Docket 96-45, RM-10822 (filed Jan. 16, 2004) at 9.

⁶³ How a rate of return regulated carrier could show that a per line cap on High Cost Fund support alone prevents it from earning its authorized rate of return is not entirely clear to Ad Hoc. Every element of a rate case would need to be examined to assess such a claim, including, but not limited to, the carrier’s rates, rate structure and the

Setting the cap at the right level is obviously critical to its efficacy. Absent a crystal ball to determine the exact right cap level, the Commission should try to set a cap that balances competing interests and considerations. The risk of setting the cap too low (making fewer subsidy dollars automatically available) is offset by the “rebuttable” nature of the cap. Setting the cap too low might cause some RLECs to incur costs to rebut the per line cap, and some Commission resources would be occupied evaluating those showings. On the other hand, the public would be at risk, and the deployment of Broadband adversely affected, if the Commission were to set the cap too high (making more subsidy dollars automatically available than are in fact needed). The “cost” of setting the cap too high is continued over-subsidization of inefficient providers, continued deadweight loss to the economy, and fewer High Cost Fund dollars to support broadband in unserved areas. Thus, on balance the Commission should lean toward setting the cap near the low end of a reasonable range.

The \$3,000 per line cap proposed by the Commission seems reasonable as an interim starting point. If anything, the \$3,000 cap likely errs on the “too high” side of the “just right” balance, but it is certainly better than the situation in place today. The \$3,000 cap cannot and should not be the end point of this process. As discussed below, Ad Hoc endorses the use of a forward-looking modeling exercise for determining a cap, or caps.⁶⁴

Ad Hoc supports replacement of the interim \$3,000 cap with a cap based upon examination of what it *should* cost to provide the universal service. Determining what it

appropriateness of its investments and expenses. In such cases, the burden of proof must be on the carrier seeking to rebut the cap.

⁶⁴ It may be that once the reverse auction process is underway, that will give the Commission a basis for setting an alternate cap or caps as well.

should cost to provide service in rural areas requires a forward-looking economic cost study – a relatively routine economic exercise that has been branded with overtones of voodoo-like evil by some in the industry. A forward-looking cost study is akin to getting bids from multiple contractors for a home improvement project. Without data regarding what it should cost to provide service in a particular study area (i.e., the forward-looking economic cost) imposing a cap is like picking a contractor and implementing the home improvement without regard to specifications or cost.

Arguments have been made in the past that developing a forward-looking economic cost (FLEC) model isn't workable for high cost carriers because of the unique characteristics of their size or terrain. Those arguments, however, should not be persuasive. A model capable of properly estimating what it should cost an efficient provider to provide service in High Cost Fund study areas may, or may not, need to be somewhat more complicated than the High Cost Model used to develop price cap carrier costs. It may require some additional variables, the input costs may vary some (labor rates, for example, are likely lower in rural Montana than in Manhattan), but overall the process should be about the same. In a paper filed with the Commission in 2004, Ad Hoc's economic experts detailed how and why the use of forward-looking costs is applicable for high cost carriers drawing USF funds.⁶⁵

Of course a funding cap is a function not only of the cost of providing service, but also of the revenues derived from services sold over the network facilities.

⁶⁵ Susan M. Gately, Lee. L. Selwyn, Scott C. Lundquist and Colin B. Weir, *Reforming Universal Service for Rural ILECs: An Idea Whose Time Has Come* (Boston, MA: Economics and Technology, Inc., 2004), filed as Exhibit A to the Comments of Western Wireless on Reform of the Rural High-Cost Support System, CC Docket 96-45 (filed December 15, 2004).

Subsidization is designed to fill the gap that exists between the costs incurred in providing service in a high cost area and the revenues that can be collected from customers for the provision of those services. Given that today's communications networks are multipurpose, the revenues being counted should account for all services sold that utilize the networks. In setting a replacement to the interim \$3,000 cap, the Commission should also develop benchmark "revenues" for voice, broadband, video, mobility and whatever other services may become available and a presumptive "take" rate for each offering. The benchmark revenue should be set at a level greater than the "average" nationwide revenue for each category (since by definition many unsubsidized customers are paying a rate above the average thereby making it "affordable" and reasonably comparable).

Finally, the Commission should not be swayed by anguished cries of how much work it will be for carriers to make a showing if they need to rebut the "rebuttable cap". The public's money is at stake. If a carrier needs subsidization at a level greater than it would receive under the rebuttable cap, the carrier should bear the cost of making its showing. Nor should the Commission be concerned that it will be inundated with filings from a huge number of carriers looking to rebut the cap.⁶⁶ While it is true that there are over 1,000 RLEC study areas in the US, many, if not most, RLECs will be operating below the cap. At the proposed initial cap level of \$3,000 per line, fewer than twenty of the RLECs will be impacted and it is likely that at least some of those carriers will

⁶⁶ An added benefit of the "rebuttable" cap is the deeper insight and understanding in RLEC operations that will be available to the Commission as a result of this process. For far too long, the Commission has been at least a step removed from any analysis of the Rate of Return LECs' costs or operating characteristics. The insight gained from this process should be helpful in the oversight and updating of the USF going forward.

choose to live within the cap rather than have their operations examined by the Commission. Others will instead opt to institute efficiencies that make their operations profitable within the cap. Going forward, as the Commission refines the cap and perhaps introduces more than a single cap (depending upon carrier circumstances) there are likely to be additional carriers that seek review, but it is unlikely to be a task so great as to flood the Commission with carrier showings of costs in excess of the cap.

E. The Commission Should Not Use An 11.25 Percent Rate of Return In Setting The Rebuttable Per Line Cap.

The Commission asks whether it should lower the authorized rate of return for any carrier that seeks to argue that the rebuttable per line cap on high cost support prevents it from earning the authorized rate of return.⁶⁷ Ad Hoc recommends that the Commission not wait until a carrier claims that the cap prevents it from earning its authorized rate of return. They should know that at the end of the proceeding, a lower per line cap could apply to them.

The last time that the FCC established an “authorized rate of return” for the RBOCs was some twenty years ago – in 1990 – when the Commission set the rate at 11.25% and established a debt/equity ratio of 42.5/55.8.⁶⁸ That rate was intended to be a proxy for what the RBOC could earn in a market where its rates were constrained by competition based on then-current market conditions (including capital costs). At the time the 11.25 percent rate was set, market interest rates were considerably higher than they are today: the prime rate was 10% and the 10-year US Treasury Bond rate was

⁶⁷ Notice, ¶ 209.

⁶⁸ *Represcribing the Authorized Rate of Return for Interstate Services of Local Exchange Carriers*, Order, 5 FCC Rcd. 7507, 7510-11 (1990).

8.89%⁶⁹ compared to 3.25% and 3.54% respectively today.⁷⁰ While the foregoing is only part of the information relevant to setting reasonable rates of return, it very strongly suggests that the Commission should lower the 11.25 % authorized rate of return, assuming the same or a similar debt/equity ratio.

Part 65 of the Commission's Rules sets forth the methodology that the Commission will use and the evidence that it will consider in setting authorized rates of return. The Commission should require any carrier, whether in the National Exchange Carrier Association (NECA) pool or not, that seeks to rebut the per line cap on high cost support to comply with all of the relevant parts of Part 65.⁷¹ Because of the Commission's historic approach to rate of return regulation of NECA pool companies, it should clearly state that it will use the same approach when evaluating carrier challenges, regardless of whether the challenging carrier participates in the NECA pool. The Commission should require *any* rural exchange carrier that attempts to rebut the per line cap on high cost support to make the showings required in Part 65 of its Rules. That showing should, of course, include a showing regarding the appropriate rate of return.

⁶⁹ *Selected Interest Rates (Daily) - H. 15 - Historical Data*, FEDERAL RESERVE BOARD, <http://www.federalreserve.gov/releases/H15/data.htm> (Under Bank prime loan, select "Monthly" link. Under Treasury constant maturities, 10 year, select "Monthly" link.) (last visited April 18, 2011).

⁷⁰ *Selected Interest Rates (Daily) - H. 15*, FEDERAL RESERVE BOARD, <http://www.federalreserve.gov/releases/h15/update/> (April 15, 2011).

⁷¹ See *Qwest Communications Corporation v. Farmers and Merchants Mutual Telephone Company*, Memorandum Opinion and Order, 22 FCC Rcd. 17973 (2007) for an explanation of how rate of return regulation has been enforced against rural local exchange carriers. Carriers that participate in the NECA pool, "[d]o not prepare cost studies and are not subject to individual rate of return scrutiny." *Id.* at 17979.

F. In Addition to the Proposals Set Forth in the Notice, the Commission Should Adopt a “low price offset” to High Cost Fund Disbursements.

In addition to the High Cost Fund program modifications proposed by the Commission in the *Notice*, Ad Hoc suggests an additional modification that will reduce *unnecessary* subsidies that will then be available for transfer to the CAF. Ad Hoc recommends making an adjustment to the per line High Cost Fund payments in those cases in which the average price for service is below the nationwide average. Such an adjustment would still recognize a carrier’s higher costs but would not provide subsidies at such a level that carriers are able to offer service to their “high cost” customers at rates that are lower than the average paid by users throughout the rest of the country.⁷² For ease of discussion this proposed adjustment to High Cost subsidies will be referred to as the “low price” adjustment.

The “low price” adjustment would be relatively easy to administer. After determining how much funding a particular study area is eligible to receive under the various High Cost Fund mechanisms (as reformed) an additional step would be implemented to determine whether the incumbent provider is charging rates at least equal to the nationwide average, and if not, the per line subsidy would be reduced to reflect the differential between the average prices and the “low” prices charged by the

⁷² As the Commission states in the *Notice*, state, not federal, regulators have authority over those portions of the local service prices other than the subscriber line. (*Notice* at ¶ 460) Many, indeed most states, however, have abdicated their authority over the setting of local service pricing leaving LECs, particularly smaller LECs free to price local services as they please. See Lilia Pérez-Chavolla, *State Retail Rate Regulation of Local Exchange Providers as of December 2006*, (Silver Spring, MD: National Regulatory Research Institute, 2007). For example, many of the “mutual” company RLECs located in Idaho and receiving USF funding are not under the Idaho PSC’s jurisdiction at all and in Iowa all small companies’ rates have been deregulated since 1983. See Gately Declaration ¶ 13 and Exhibit SMG-15.

high cost LEC. Data for analyzing RLEC prices should be readily available to the Commission given that NECA recently supplied the data sought in the Commission's March 29, 2011 letter requesting specific pricing and other data.⁷³

The *Notice* reports a national average rate per line of \$15.62 (\$25.62 inclusive of all rates and fees) and notes that many ILECs charge prices below that average. Elsewhere in the *Notice* the Commission cites an earlier Verizon filing that shows that rural carriers on average charge only 90% of the nationwide average rate.⁷⁴ Many rural carriers charge rates well below that nationwide average. For example, a 2011 report by the Texas PUC on the state of competition contains a table comparing the prices for local service from various providers and includes data showing that Blossom Telephone (442038), a Texas RLEC with approximately 1,000 subscribers, charges \$7.00 per month for residential local service and \$9.00 per month for business service.⁷⁵ The same Texas PUC table documents AT&T's price for local service in Dallas at \$20 for residential service and \$43 and \$52 respectively for business single lines and trunks. An earlier Texas PUC report on its USF program contained data documenting basic residential local service prices for 54 small RLECs in Texas. The table revealed about a dozen RLECs offering service for between \$5 and \$6 per month, forty-seven offering

⁷³ Letter from Sharon Gillette, Chief, Wireline Competition Bureau to Regina McNeil, General Counsel, NECA, CC Docket No. 01-92, D.A. 11-575 (Mar. 29, 2011).

⁷⁴ *Notice* at n.270.

⁷⁵ See Gately Declaration ¶ 13 and Exhibit SMG-16. Working loop data from *HC08 - Local Switching Support Projected by State by Study Area - 2Q2011*, UNIVERSAL SERVICE ADMINISTRATIVE COMPANY, at www.usac.org/about/governance/fcc-filings/2011/quarter-2.aspx (last visited April 18, 2011).

prices of \$10 or less per month, and only three identified as offering prices above the level of the FCC's reported nationwide average of \$15.62.⁷⁶

Blossom Telephone received just over \$1 million in high cost funding in 2010⁷⁷ – a level that allows it to price residential service at \$13 per month *below* a “reasonably comparable,” “urban” “affordable” rate charged to AT&T's subscribers elsewhere in the state. Even for a small company like Blossom Telephone and its 1,000 or so subscribers, analysis of the per line differential between the Blossom rate and the AT&T rate in Dallas demonstrates that Blossom is, at a minimum, being over subsidized by \$156,000 (\$13 x 1000 lines x 12 months). That is an additional \$156,000 that should be transferred to the CAF immediately.

In the longer run, the “low price” adjustment should be based upon “total revenue per subscriber” incorporating not only basic local service prices, but the prices for all services offered in conjunction with the access line; for the near term, however, the less comprehensive adjustment could target millions for transfer from the existing high cost mechanisms to the CAF.

G. Ad Hoc Supports the Commission's Proposal to Transition Interstate Access Support (“IAS”) to a Newly Established Connect America Fund (“CAF”)

Ad Hoc, of course, supports the Commission's proposal to transition IAS funds to the newly established CAF because, as the Commission correctly notes, IAS has long outlived its intended lifespan and usefulness. The Commission has sufficient legal authority to mandate this transition. Ad Hoc agrees with the Commission that neither

⁷⁶ Gately Declaration Exhibit SMG-17.

⁷⁷ Id. Exhibit SMG-18.

incumbent nor competitive LECs have an inviolable property interest in IAS funds.⁷⁸ Put simply, recipients of IAS subsidies are beneficiaries of Commission policies which are subject to change. There is no reason to phase-out the IAS elimination over two years as contemplated by the Notice.⁷⁹ Rather, the Commission should cap IAS disbursements at 2011 levels and make the entirety of those funds available through the CAF in 2012. Movement of subsidy dollars from the IAS to the CAF was among the recommendations of the National Broadband Plan released a year ago and a proposal to do so was put forth in the Commission's *USF Reform NOI/NPRM*⁸⁰ released last year. At that time not a single commenter, including those presently receiving IAS subsidies, provided evidence that IAS funds were necessary for the continued provision of universal service.⁸¹ IAS recipients have had more than adequate notice that the IAS funding gravy train will be coming to an end.

IAS funding levels were set for the five year period of the CALLS plan⁸² – and no longer. The 2003 *CALLS Remand Order* specifically noted that the FCC could move the IAS funding upward or downward at the end of the five year CALLS transition period,⁸³ and the Commission did reduce the level of IAS funding available to the price

⁷⁸ Notice ¶ 234.

⁷⁹ Notice ¶ 228 and Appendix A, §§ 54.807(a)(1)-(2).

⁸⁰ Connect America Fund, Notice of Inquiry and Notice of Proposed Rulemaking, 25 FCC Rcd. 6657 (Apr. 21, 2010) (*USF Reform NOI/NPRM*) at 6680-81, ¶¶ 57-58

⁸¹ Notice ¶¶ 232-233.

⁸² *Access Charge Reform*, Sixth Report and Order, CC Docket Nos. 96-262 and 94-1, Report and Order, CC Docket No. 99-249, Eleventh Report and Order, CC Docket No. 96-45, 15 FCC Rcd. 12962 (2000) (subsequent history omitted) (*CALLS Order*) at 12974-12975, ¶ 30

⁸³ *Access Charge Reform; Price Cap Performance Review for Local Exchange Carriers; Low-Volume Long Distance Users; Federal-State Joint Board On Universal Service*, CC Docket Nos. 96-262, 94-1, 99-249, 96-45; 15 FCC Rcd. 12962 (rel. July 10, 2003) (*CALLS Remand Order*) at 14995 ¶ 31.

caps carriers (and the amount of IAS funding overall) as part of the 2008 *Interim Cap Order*⁸⁴. The elimination of IAS funding and transfer of the funding dollars to the CAF that is proposed in the *Notice* is no different than the implementation of the 2008 Cap.

The Commission reiterates in the *Notice* that the IAS was created to “keep regulated voice rates affordable”⁸⁵ yet, as discussed above, as recently as last year, parties filing comments on the elimination of the fund could provide no evidence that they need Interstate Access Support (IAS) to ensure affordable service or even that recipients are using their funding for that purpose.⁸⁶ There is also no evidence or reason to expect that the IAS funds are or will be used by the recipients to fund deployment of broadband services to unserved areas.

The *CALLS* plan ended almost six years ago; it is time for IAS to end as well. At this point the IAS is nothing more than a mechanism that transfers money from subscribers that pay universal service surcharges to the ILECs and CETCs that receive IAS disbursements. Any link to the goals set forth in Section 254 of the Act is missing.

Moreover, since the FCC has not completed development of a new price adjustment mechanism (“X” factor) to replace the factor that was originally designed to be in place during the five-year *CALLS* plans, no downward price adjustments (to reflect productivity in the telephone industry) have been required of the price caps carriers.⁸⁷ Not surprisingly, the price cap ILECs have been earning excessive returns on their

⁸⁴ *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Order, 23 FCC Rcd. 8834 (2008) (*Interim Cap Order*).

⁸⁵ *Notice* ¶ 229.

⁸⁶ *Id.* ¶¶ 232-233 & f.366

⁸⁷ The *Notice* ¶236 contains a full discussion of the lack of productivity-driven price reductions since the conclusion of the *CALLS* plan in 2005.

interstate access services for several years, and earnings reports, at least while they were available, demonstrated ever increasing profits in the interstate jurisdiction. Based upon the last data available (for year-end 2007), AT&T, Verizon and Qwest generated interstate rates of return across the broad range of their interstate services of 35%, 25% and 53% respectively.⁸⁸ Earnings data for the three largest price caps carriers are no longer collected by the Commission.⁸⁹

The RBOCs are not the only price caps carriers earning returns substantially beyond anything that would be sustainable in a competitive environment yet continuing to receive IAS subsidies. The FCC's most recent *Trends* report details interstate earnings averaging between 10.76% and 99.56% for non-RBOC price cap carriers for 2008 (the most recent year available in the report).⁹⁰ The highest of the earners – Windstream's operating company serving Lexington, Kentucky – reported earnings of 99% in 2008 the same year it received \$4.9 million in IAS funds (and \$3.6 million in HCM funds).⁹¹ Since that time, and despite the clear evidence that no universal support

⁸⁸ Calculated from ARMIS 43-01 reports for 2007. More granular interstate rate of return data for AT&T, Verizon and Qwest as well as for the other price cap carriers that are IAS recipients are found in *Trends in Telephone Service* Table 4.1. For a discussion of the continued usefulness of ARMIS-based rate of return calculations, see Susan Gately, Helen E. Golding, Lee L. Selwyn and Colin B. Weir, *Longstanding Regulatory Tools Confirm BOC Market Power: A Defense of ARMIS*, (Boston MA: Economics and Technology, Inc., Jan. 2010), attached to Comments of Ad Hoc Telecommunications Users Committee on the Notice in WC Docket 05-25 (filed Jan. 19, 2010).

⁸⁹ AdHoc believes that the primary reason for the inflated earnings levels is the continued overpricing of special access services. Nonetheless, as a result of the Commission's failure to fix special access overpricing, any high cost characteristics that may have existed in price cap LEC territory have been compensated for many time over with special access overearnings, and there is no need for additional high cost IAS funding to flow to these carriers in the future.

⁹⁰ See Gately Declaration ¶ 14 and Exhibit SMG-19.

⁹¹ *Id.* ¶ 14 and Exhibit SMG-20.

was necessary, another \$4.9 million in 2009, \$5.4 million in 2010, and \$0.9 million so far for the first two months of 2011 has been disbursed to Windstream for this same study area.

IAS was part and parcel of the five year deal that was the CALLS Plan. The CALLS plan required the reduction of switched access charges for the RBOCs and GTE to a target rate of \$0.0055 per minute (\$0.0065 per minute for other price cap LECs). As an aid to reaching those target rates the Commission essentially moved \$650 million in access revenue from the access tariffs to the IAS as part of the USF. Today, after expiration of the CALLS Plan, the IAS disbursements that were created to facilitate the switched access reductions remain, but switched access rates now exceed the CALLS target ranges. The average price for an interstate switched access minute of use for Price Caps and NECA carriers increased by 33% from the end of the CALLS switched access rate reduction transition to present.⁹² Over the course of just the past year the average price for price cap carriers increased by 4%.⁹³

No exogenous cost (or “Z”) adjustment to the price cap LECs Price Cap Index is required or appropriate in conjunction with the elimination of the IAS fund and the transfer of a comparable funding level to the CAF. “Z” adjustments are for changes to *costs* – not revenue – flows and the only exogenous adjustment to PCI levels contemplated by the Commission’s rules is the “Z” adjustment.⁹⁴ Section 61.45(d) of the Commission’s Rules clearly identifies the “Z” as an exogenous *cost* adjustment:

⁹² *Id.* Exhibit SMG-21.

⁹³ *Id.* Exhibit SMG-22.

⁹⁴ The *Notice* mischaracterizes the function of exogenous adjustments allowed under the FCC Price Cap rules in its statement at ¶ 235 that “For example, a price cap carrier typically would be permitted to make an exogenous adjustment to its price cap

(d) The exogenous cost changes represented by the term “Z” in the formula detailed in paragraph (b)(1)(i) of this section shall be limited to those cost changes that the Commission shall permit or require by rule, rule waiver, or declaratory ruling.⁹⁵ (Emphasis added.)

While Section 61.45(d) of the Commission’s Rules gives the Commission discretionary authority to “permit or require” additional categories of adjustments, the rule speaks of “tax law changes and other extraordinary cost changes.”

In fact, if an “exogenous” adjustment were possible one would have expected to see such exogenous cost adjustments showing up in the filings of the price caps LECs at the time the Commission capped the IAS plan in 2008.⁹⁶ The effect of that cap, which was to reduce the amount of IAS funding some carriers would receive absent the cap, was functionally equivalent to the Commission’s present proposed transition of funding from the IAS to the CAF. Our review to date of price caps LECs filings following imposition of the 2008 cap reveals no such exogenous treatment.

Even if the Commission were to determine that an exogenous adjustment to offset the reduction in IAS disbursements to price cap LECs is necessary, it should

indices (which are used to set access rates including SLCs) when a regulatory change materially affects its ability to recover its permitted revenues.” In fact the existing rules would *preclude* an exogenous change to the PCI levels based upon any change that impacts revenue collection.

⁹⁵ The Commission’s recitation of language from the *LEC Price Cap Order* at 6807 explaining the “Z” adjustment is useful here. “Exogenous costs are those triggered by administrative, legislative, or judicial action beyond the carriers’ control. These costs are created by such events as: the expiration of amortizations; changes in the Uniform System of Accounts; separations changes; changes in universal service fund obligations; the reallocation of regulated and nonregulated costs; tax law changes; retargeting the PCI for price cap carriers taking advantage of the low-end adjustment mechanism; inside wire amortizations; and the completion of amortization of equal access expenses.”

⁹⁶ *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Order, 23 FCC Rcd. 8834 (2008) (*Interim Cap Order*).

nonetheless continue with the proposed elimination of the IAS and transfer of IAS dollars to the CAF. To the extent an exogenous adjustment is required there are any number of offsetting adjustments the Commission could and should consider implementing to keep the already over earning price caps LECs from locking IAS dollars permanently into their access rate structures.

As the Commission details in the *Notice* the price caps plan has been missing the crucial “productivity offset” component of the original plan since 2000. Ad Hoc and other parties have told the Commission in WC Docket 05-25, that the time is past ripe for the Commission to reinstitute a productivity-based “X” into the price caps plan.⁹⁷ The “X” factor today is no longer a productivity factor, but a “price adjustment mechanism,” and it is set so as to ensure that no price caps plan-driven reductions will occur as long as it remains in place. The Commission has the ability to either reset the *price adjustment* “X” at a level designed to bring interstate prices to a certain level (for example to bring access earnings levels back to reasonable levels or perhaps just to offset any arguable IAS-driven exogenous adjustment – that, as explained above, is clearly not necessary for the ILECs to recover their costs) or to represcribe a new productivity-based “X.” In 2005 Ad Hoc prepared and submitted two separate productivity analyses into the record and two years later Sprint submitted updated studies in the “refresh the record” phase of the same proceeding.⁹⁸ Ad Hoc has not

⁹⁷ See Comments of the Ad Hoc Telecommunications Users Committee, CompTel/ALTS, Global Crossing North America, Inc., and NuVox Communications, the New Jersey Division of the Ratepayer Advocate, and Sprint Corporation on the Order and NPRM in WC Docket No. 05-25, RM-10593 (filed June 13, 2005).

⁹⁸ Reply Declaration of Susan M. Gately attached as Exhibit 2 to the Reply Comments of the Ad Hoc Telecommunications Users Committee on the Order and NPRM in WC Docket No. 05-25, RM-10593 (filed July 29, 2005) and Comments of

submitted a new study in context with the current *Notice*, but should the Commission formally propose to re-introduce a productivity based “X” factor, Ad Hoc would contemplate updating its 2005 study.

IV. The FCC Should Eliminate the Identical Support Rule

Ad Hoc supports the Commission’s proposal to eliminate the identical support rule.⁹⁹ Such funding has bloated the USF and serves no legitimate objective. Elimination of the rule is long overdue. Reallocation of funds wasted on the identical support rule would provide additional funding for deployment of broadband.

From its inception, the identical support rule has inefficiently allocated High Cost Fund dollars. As the Commission notes, a “significant amount” of high cost support is provided to subsidize “competition” for services that are already provided by High Cost Fund recipients.¹⁰⁰ In some study areas, subsidized providers actually compete against un-subsidized providers, raising the serious question about the need to subsidize service in these areas. All of this support is provided without regard to actual costs,¹⁰¹ taking an already problem-riddled funding mechanism, and aggravating the economic waste it causes.

Under normal circumstances, the allocation of High Cost Fund dollars without regard to the number of recipients or relevant costs would make no rational economic sense. Under the current circumstances, where the size of the High Cost Fund has ballooned over the last decade and the contribution factor necessary to support High

Sprint Nextel Corporation on the Public Notice in WC Docket No. 05-25, RM-10593 (filed Aug. 8, 2007).

⁹⁹ *Notice* ¶ 247.

¹⁰⁰ *Id.* ¶ 246.

¹⁰¹ *Id.*

Cost Factor is on a steady upward trajectory, continued adherence to the identical support rule would be irresponsible.

Ad Hoc supports the Commission's general proposal to transition competitive ETC funding currently provided through the identical support rule to the CAF.¹⁰² The recaptured dollars should be awarded to providers subject to meaningful competitive mechanisms¹⁰³ that will ensure the CAF's goals – expanding broadband widely and efficiently – are satisfied with a minimum of economic waste directed to inefficient or ineffective providers. The Commission should allocate funds on a technologically neutral basis, and High Cost Fund support should not be reserved or otherwise set aside to fund a particular service or service provider if less expensive but equally effective alternatives are available.

V. The Commission Should Adopt Sensible Priorities and Implement Traditional Budget Controls to Maximize the Efficiency and Effectiveness of the CAF

Ad Hoc urges the Commission to implement and manage the CAF so that funds are disbursed effectively, efficiently and in a manner that focuses on and benefits *consumers*, not providers.¹⁰⁴ To achieve that objective, the Commission should carefully consider the well-established failings of the current High Cost Fund and try to avoid repeating past mistakes in the creation and administration of CAF.

¹⁰² *Id.* ¶ 248.

¹⁰³ The Commission refers to such methods in ¶ 248 and provides further details of the proposed CAF later in the *Notice*.

¹⁰⁴ See *Alenco v. FCC*, 201 F.3d 608, 620 (5th Cir. 2000).

As currently structured and administered, the High Cost Fund is an unsustainable mess. Unlike the Schools and Libraries component of the Universal Fund,¹⁰⁵ the High Cost Fund has never had an explicit overall cap to limit disbursements. The history of the fund demonstrates that, without such a cap, demand for fund dollars will push the size of the fund ever upward.¹⁰⁶ With a seemingly endless pool of dollars available for disbursement, the Commission never established priorities regarding allocation of such funds. Instead, the Commission has allowed for the interstate USF contribution factor to soar, rather than limiting disbursements.

Relentless upward pressure on the contribution factor has profound downstream effects on end users who fund the cost of this demand through the charges imposed on their telecommunications services. In the case of large business users that comprise Ad Hoc's membership, the unpredictability of an ever changing (and difficult to predict) contribution factor makes annual budgeting for telecommunications services exceedingly difficult, and the seemingly never ending growth of the High Cost Fund diverts funds that businesses could invest in new facilities and in job creation.

The current rules encourage providers to report higher costs to obtain higher subsidies. The Commission does not assess the accuracy or appropriateness of reported costs. No business of any size in America, and few, if any, government programs operate with such ill-defined priorities and lack of accountability.

The creation of the CAF, however, presents the Commission with a unique opportunity to restructure high cost support. Ultimately, Ad Hoc urges the Commission

¹⁰⁵ E-rate funding is capped at \$2.25 billion, indexed to inflation. *Schools and Libraries Universal Service Support Mechanism*, 25 FCC Rcd. 18762, 18781 (2010).

¹⁰⁶ See, e.g., *Notice* ¶ 6 (noting that the high cost component of the fund has grown from \$2.6 billion in 2001 to \$4.3 billion in 2010).

to ensure that the “future-state” CAF that replaces USF operates pursuant to: (i) an explicit budget with a fixed annual cap; (ii) a clear set of reasoned priorities that balance the Commission’s multiple statutory priorities for universal service; and (iii) a stable and predictable funding methodology.

Ad Hoc strongly supports the Commission’s proposal to fund Phase I of the CAF with a “defined amount.”¹⁰⁷ The Commission’s proposal to direct the specific amount of savings achieved through High Cost Fund reform measures would provide a defined amount of money for funding Phase I. Redirection of a specified amount would more effectively serve universal service goals than the manner in which the High Cost Fund has operated to date.

Operating the CAF pursuant to a fixed annual budget amount, the Commission would have to make choices about how to disburse limited funds in a manner that balances the statutory priorities set forth in Section 254.¹⁰⁸ Balancing priorities with limited funds will require the Commission to make difficult choices, but making such choices is precisely the obligation that Section 254 of the Act imposes on the Commission.

In addition, when making decisions about the amount of broadband subsidies, Ad Hoc urges the Commission to take a hard look at current consumer behavior to understand better what constitutes a “just, affordable and reasonable” rate for broadband services. Data suggests that, over the last decade, consumers are willing to pay increasingly larger amounts for Internet access and wireless services, in addition to

¹⁰⁷ Notice ¶ 274.

¹⁰⁸ *Qwest v. FCC*, 258 F.3d 1191, 1199 (10th Cir. 2001).

the amounts they already spend on POTS.¹⁰⁹ When assessing notions of “affordability” for broadband, the Commission should take into account the amounts that consumers are already willing to spend, without significant subsidies, to purchase non-traditional services.

VI. Intercarrier Compensation Reform

Ad Hoc supports, and has consistently supported, adoption of a single, economically rational intercarrier compensation (“ICC”) regime. Carriers currently pay each other vastly different rates under multiple regulatory regimes for using the same local exchange networks to obtain origination and termination services that are functionally the same. This situation is economically irrational and distorts investment and purchase decisions. Those distortions in turn produce an economic loss that harms buyers of telecommunications goods and services and the country more generally.

As part of its effort to rationalize intercarrier compensation, however, the Commission should resist carrier demands for reform that is “revenue neutral.” The carriers have never proffered a showing that their existing revenue streams are unreasonably low. At the same time, the available data demonstrates that the largest incumbent local exchange carriers (“ILECs”) are earning excessive interstate returns and the Commission has no idea what rural local exchange carriers (“RLECs”) are earning. Ad Hoc does not doubt that many carriers, particularly the RLECs, derive a material portion of their revenues from access charges and universal service payments. That fact alone, however, is far from a justification for guaranteeing the same revenue

¹⁰⁹ See *Trends in Telephone Service* at 3-6 (Sept. 2010).

stream under a revised ICC regime, without regard to a carrier's actual costs and profits.

A. The Commission Should Replace the Current ICC Regime With a “Bill and Keep” Rate Structure

The *Notice* asks for comment on the option of replacing all intercarrier payments with an arrangement that it describes as “bill-and-keep.”¹¹⁰ Ad Hoc supports adoption of a “bill and keep” compensation system. But some clarification of the proposal in the *Notice* is required because it appears to differ from the traditional understanding of that concept. Seen in the context of “sender-pays” pricing at the retail level, the traditional understanding of “bill-and-keep” is that the originating carrier (Carrier A) retains all of the revenue it collects from its customer who originates the call, and makes no cash payment to the terminating carrier (Carrier B), the latter being compensated “in kind” when the two carriers’ respective roles are reversed (*i.e.*, when Carrier B sends originating traffic to Carrier A for termination at no cost to Carrier B). The system presumes that Carrier A’s end user charges recover only its cost for outbound traffic while its costs for terminating Carrier B’s inbound traffic would be “paid” in the form of reciprocal treatment by Carrier B when it terminates Carrier A’s outbound traffic. This reciprocity element also presumes a balance of traffic between the two providers.

The bill and keep arrangement described in the *Notice*, however, suggests that in lieu of actual intercarrier revenue or “balance of traffic” reciprocity requirements, carriers would be expected to recover the costs of both originating and terminating traffic from their own end users.¹¹¹ A more general statement of the approach being suggested in

¹¹⁰ *Notice* ¶ 530.

¹¹¹ *Id.*

the *Notice* is that the originating customer would pay only for *originating* a particular call and the recipient would pay for *terminating* that call. Under this arrangement, there would be no need for any intercarrier payment since each participating carrier would be compensated for its portion of the end-to-end communication by its own retail customer. Indeed, that is perhaps the only way in which an arrangement of the type that the *Notice* describes as “bill-and-keep” could actually operate.

At a conceptual level, the approach suggested in the *Notice* has considerable merit. If it were implemented uniformly and comprehensively across all services, technologies, carriers, and jurisdictions, all carrier-level exchanges of traffic would be on a fee-free basis, there would no longer be any issue associated with out-of-balance traffic, and the terminating monopoly problem would be eliminated along with perverse “traffic pumping” and harmful “arbitrage.” Unfortunately, the path from concept to implementation is anything but simple or straightforward.

There are at present two principal areas in which the type of “bill-and-keep” that the *Notice* envisions – *i.e.*, a payment-free exchange of traffic – is currently in use. These are peer-to-peer exchanges of Internet backbone traffic between participating Internet Backbone Providers (“IBPs”) and wireless airtime.

IBP networks exchange traffic on a no-fee basis at designated “peering points” within the global Internet. This reciprocal approach to traffic exchange arose without any regulatory involvement or prescription. Each IBP establishes and publishes its own “peering policies” that, if satisfied, would qualify another IBP for participation in the no-fee traffic exchange. While individual IBP policies differ slightly, in general all require (a) that traffic be roughly (although not precisely) in-balance, and (b) that a no-fee handoff

would only apply where the traffic is to be terminated on the recipient's network. If the traffic is destined for another network, the recipient is deemed to be providing a "transit" service for which it is entitled to payment. The largest IBPs thus maintain at least one peering point with each of the other major IBPs so as to minimize "transit" situations.

Wireless airtime is another example of a service for which no intercarrier termination fees are imposed. In the U.S., wireless airtime charges are incurred by both the calling and called parties. That is, the wireless carrier receives airtime revenue only from its own customer, whether that customer is using the airtime to place or receive a call. There is thus no need for any intercarrier payment with respect to airtime.

What distinguishes both of these cases from the switched voice world is that the same revenue arrangement applies at both the wholesale and retail level. Retail wireless customers pay for all of their airtime regardless of whether they use it to send or receive calls. Retail Internet access customers pay for all of their bandwidth regardless of whether they're downloading or uploading. By contrast, "sender-pays" pricing still applies at the retail level to conventional local and long distance calling; senders pay for long distance calls (or local calls in areas with local measured use pricing) and recipients pay no additional charge for calls they receive.

There is considerable merit to the idea of replicating for all traffic the wireless and Internet model of fee-free exchanges because that model eliminates most of the disputes and mispricing inefficiencies that arise under existing reciprocal compensation, access charge, or bill-and-keep regimes. The problem, however, is that fee-free exchanges can only be successful if the Commission requires the retail pricing regime to conform to the wholesale intercarrier pricing regime, to ensure that retail rate

structures and rate levels are consistent with recovery of originating *and* terminating costs from the end user, regardless of the carrier's balance of traffic. As long as sender-pays pricing is retained at the retail level, "bill-and-keep" pricing at the wholesale level would, from the perspective of the originating carrier, create a disparity between rates and costs because the zeroed-out intercarrier compensation rates would no longer be available to recover the carrier's incremental costs of terminating calls. Moreover, bill-and-keep would still produce "arbitrage" incentives, though on the part of the originating carrier rather than the terminating carrier, because the originating carrier who collects and retains all of the revenues from its own customers would have a powerful incentive to minimize its network investment and hand-off the calls to other carriers as soon as possible in the call path.¹¹²

Sender-pays retail pricing has a long tradition in the telecommunications industry. The sender (caller) is viewed as the "cost-causer" and is expected to pay for the costs being caused by the sender's decision to originate a telephone call. In the *Notice*, the Commission itself states that "[u]nderlying historical pricing policies for termination of traffic was the assumption that the calling party was the sole beneficiary and sole cost-causer of a call. More recent analyses, however, have recognized that both parties generally benefit from participating in a call, and therefore, that both parties should share the cost of the call."¹¹³ Whether or not this "assumption" was actually responsible for the "historical pricing policies for termination of traffic," if it is now to be revised to

¹¹² The Commission's analysis of the appropriate standards for establishing points of interconnection, discussed at ¶¶ 680-682 of the *Notice*, must include some consideration of pricing impact and the development of rules which will ensure that end user charges recover no more than the carriers' costs of transmitting end user traffic to and from the POI.

¹¹³ *Notice* ¶ 525.

one in which both parties benefit, it is critical that adoption of this new theory be uniformly and comprehensively applied at the retail level as well as with respect to intercarrier hand-offs.

While the NPRM suggests that carriers would recover origination and termination costs from their own end users under the Commission's bill and keep scheme, nowhere does the Notice suggest how such a fundamental revision to "sender-pays" retail pricing might be accomplished. It would necessarily involve state regulators as well as local and interexchange carriers each of which is itself subject to different, and perhaps mutually incompatible, regulatory regimes. And in jurisdictions that have already deregulated local telephone service rates, the Commission will need to develop some mechanism for enforcing any transition from "sender pays" to "both parties pay" rate structures.

Under a "both parties pay" approach where retail and wholesale pricing structures are properly aligned, the sender and recipient each pays for usage at their end of the call, irrespective of which party originated the call. When that is the case, there is no longer any need for intercarrier compensation, just interconnection. If both ends of the call are on the same carrier's network – *i.e.*, no intercarrier hand-off is necessary – the carrier is compensated for the entire call, except that payment of such compensation is split between the sender and the recipient.

Because carriers would be fully compensated for their service, balance of traffic would not be an issue. The Internet model illustrates this point. In the Internet world, each customer buys and pays for access and transport into the "cloud" up to a "peering point" where traffic is exchanged with other networks. Each customer (whether the

subscriber “eyeball” or the website host) is responsible for ordering and paying for the bandwidth it needs to carry its traffic, in either direction, to/from the peering point. So while Netflix, for example, receives very little inbound traffic, it sends out large quantities of outbound traffic and must pay its content delivery network or other provider for that bandwidth. At the other end, most consumer end users receive far more traffic (e.g., from Netflix) than they send into the cloud. Consumers must similarly specify and pay for the bandwidth that is sufficient to carry the streaming video or other downlink traffic being sent to them. When each party pays for the bandwidth it needs, it no longer matter whether the respective exchanges of traffic are in or out of balance.

The same model can – and should – be applied to all types of traffic, voice or data, wireline or wireless, traditional TDM or IP.

The requirement that changes be made concurrently both at the wholesale and retail levels may not be practical in the short run, and is certainly at odds with the type of multi-year transition envisioned in the NPRM. Resolution of intercarrier compensation is long overdue, however, and is critical to assuring the success of a deregulatory and pro-competitive telecom policy. Universal service funding and support for the National Broadband Plan is a separate issue from intercarrier compensation, and the Commission needs to de-link the two so that it can immediately address and correct the inefficient and anticompetitive character of existing ICC rules.

B. Carrier Demands for “Revenue Neutrality” are Unsupported and Cannot Justify Rates That Are Unjust and Unreasonable

The Communications Act prohibits unjust and unreasonable rates.¹¹⁴ Yet the Commission would be imposing unjust and unreasonable rates if it were to establish new or increased rate elements in the name of “revenue neutrality” for carriers who already have an adequate opportunity to recover their costs plus a reasonable profit, even after ICC charges are reduced or eliminated, from the revenues they receive for the regulated and non-regulated services provided over their networks. Therefore, the Commission should resist carrier demands for new charges – or automatic increases in existing rate elements – when access revenue is reduced by ICC reform unless the carrier first demonstrates that it has no other revenue opportunity for recovering its costs through its existing rates and charges. Carriers are not entitled to rate increases merely because they’ve grown accustomed to an artificially inflated intercarrier compensation revenue stream under the existing regime and wish to preserve it.

Guaranteeing revenue neutrality regardless of a carrier’s underlying costs, or with no examination of those costs to determine whether a carrier is profitable even with reduced ICC revenues, cannot be justified by any overriding goal of “mak[ing] affordable broadband available to all Americans”¹¹⁵ because there is no assurance that any such guaranteed revenues will be used for broadband investment. If “revenue neutrality” mechanisms produce free cash that is available for investment or other uses, carriers can be expected to invest in broadband if and only if they believe that such investment will be profitable. Indeed, pursuit of an investment program known to be *unprofitable*

¹¹⁴ 47 U.S.C. § 201(b).

¹¹⁵ Notice ¶ 490.

would violate the carrier management's fiduciary obligation to its shareholders so it is far more certain that such an investment would *not* be made than that it would.¹¹⁶

Instead of guaranteeing revenue neutrality as part of ICC reform, the Commission should establish a rebuttable presumption that carriers do not need to raise other rates when ICC charges are reduced or eliminated. Carriers would be free to rebut the presumption when they file tariffs increasing their end user charges. A showing sufficient to rebut the presumption should include, at a minimum, (1) the usage sensitive access revenue lost as a result of a new intercarrier compensation regime, (2) the demand stimulation effect of lower access charges, (3) the revenue effect of increased charges authorized by the Commission, (4) other possible rate changes and their effect on revenues, (5) anticipated revenues and earnings after implementation of new intercarrier compensation rules, taking into account all carrier revenues and earnings, and (6) the rate of return deemed reasonable given the risks and market conditions confronting the carrier. To the best of AdHoc's knowledge, carriers have not made such showings to justify their demand for revenue neutrality in this docket.

While these showings would require carriers to dedicate resources to their preparation, they are necessary before the Commission can reasonably adopt, or allow carriers to implement, increases in end user charges for the sake of revenue neutrality. This is because deregulatory initiatives at the state level, elimination of the productivity

¹¹⁶ The Commission cannot ignore the fact that the largest ILECs – those with the most resources capable of supporting extensive broadband deployment – have been divesting portions of the legacy footprints where broadband is both least profitable (or negatively profitable) and/or where the National Broadband Plan expressly concluded that some form of explicit subsidy would be required. Verizon, for example, has withdrawn entirely from five states in its original geographic region and has sold off hundreds of exchanges in 14 others – mostly former GTE operating areas.

offset X-factor at the federal level, and the elimination of requirements that ILECs disclose the financial results of their operations (even with respect to services that putatively remain subject to federal or state regulation), have all operated to permit the ILECs to increase revenues and profits with no requirement that they maintain "revenue neutrality" or make offsetting reductions in customer charges to account for such revenue gains. In addition, ILECs are providing new and non-regulated services using the same common network infrastructure as basic dialtone service, affording them an expanded opportunity to more than recover the costs associated with operating and enhancing their local networks. Under these conditions, the Commission has no basis for concluding that revenue neutrality is necessary or even beneficial.

1. The Commission's Evaluation of Carrier Eligibility for Revenue Recovery Schemes Should Include Revenues From Both Regulated and Non-Regulated Services

The Commission states in the *Notice* that it does not believe ICC reform must be revenue neutral because carriers have a variety of revenue sources from the regulated and unregulated services they provide over their networks.¹¹⁷ Accordingly, the *Notice* asks whether the Commission should evaluate carrier revenues at the total interstate level (*i.e.*, switched and special access revenues combined) or total company regulated and non-regulated revenues.

Ad Hoc strongly supports the Commission's analysis, a position on which it is joined by numerous other commenters who have already filed in the record of this

¹¹⁷ *Notice* ¶ 568.

proceeding.¹¹⁸ The *Notice* has a concise statement of one the strongest arguments in support of its analysis:

Under our “no barriers” policy, a significant portion of rate-of-return carriers’ costs, including costs of upgrading the network with fiber for broadband, is allocated to regulated services, even though non-regulated services increasingly have been provided using that same network, and have accounted for an increasing percentage of revenue. As a policy matter, when evaluating recovery in the context of intercarrier compensation reform, it is unclear why the Commission would simply ignore all revenues earned from such services.

Notice at paragraph 569. Ignoring non-regulated revenues would be particularly unreasonable when, as the Commission has also recognized, “non-regulated services are an increasingly important source of revenues derived from multi-purpose networks.”¹¹⁹

The Commission’s conclusion regarding the allocation of costs to regulated services for facilities used by non-regulated services is not, of course, confined to the rate-of-return LECs mentioned in the quote above. Price cap LECs were (and most likely still are, although there is currently no direct means of verifying it) allocating costs associated with non-regulated services to their regulated services under precisely the same “no barriers” policy. The Commission’s ARMIS reports, which are available through calendar year 2007, reflect these misallocations and, to the extent that the reported *regulatory* earnings reflect these over-allocations of costs to regulated services, the results reported in ARMIS may significantly understate the actual earnings being generated by services still subject to regulation.

¹¹⁸ *Id.* n.846

¹¹⁹ *Id.* ¶ 564.

Even if costs had been and are being properly allocated such that revenues and costs can be aligned, the substantial amount of joint costs and joint infrastructure investment that is required to support both regulated and non-regulated services compels the conclusion that revenues and earnings be evaluated on a combined basis across both sectors. By definition, a joint cost (of two or more products or services) is one that cannot readily be allocated or, put differently, is one that would be essentially the same if only one of the services involved were being provided. In other words, if joint costs are allocated, for example, on a 50/50 basis between regulated and non-regulated services, the non-regulated service would still benefit to the extent that any portion of the joint cost is assigned to the regulated service. But for the existence of the regulated service, the non-regulated service would need to bear the entire joint cost by itself.¹²⁰ Since any “allocation” of the joint cost would necessarily be arbitrary, and in any event the allocation of any portion of the joint cost to the regulated service would benefit the non-regulated service, it is essential that the revenues, costs, and overall profitability of the carrier be evaluated with respect to all of its services, irrespective of their individual regulatory status.

¹²⁰ For example, suppose that service “A” involves \$5 of direct cost and that service “B” involves \$8 of direct cost, and that the two share joint costs of \$14. If service “A” were provided on a stand-alone basis (i.e., without service “B”), its cost would then be \$19 (i.e., \$14+\$5); similarly, if service “B” were provided on a stand-alone basis (i.e., without service “A”), its cost would be \$22 (i.e., \$14+\$8). If “A” is regulated while “B” is nonregulated and competitive, the existence of “A” makes it possible for the carrier to offer “B” at less than its stand-alone cost, since as long as the price of “A” exceeds \$5, some portion of the joint cost of the two services will be borne by “A”. Although “A” is not “subsidizing” “B” in any formal sense, by virtue of providing both the regulated service “A” and the nonregulated service “B”, the carrier gains a formidable competitive advantage over rivals that only provide “B”.

2. The Commission Should Develop Local Rate Benchmarks and Impute Benchmark Revenue to Carriers Seeking Eligibility for Revenue Recovery Schemes

The *Notice* seeks comment on the use of rate benchmarks and the imputation of benchmark revenues to determine a carrier's eligibility for additional revenue recovery through a federal revenue recovery mechanism. Ad Hoc supports this approach. The Commission should select a rate benchmark and impute local revenues consistent with the benchmark to carriers seeking additional recovery revenues, whether or not the carrier or state regulatory authorities have established end user charges consistent with the benchmark.

In setting its rate benchmark, the Commission should update assumptions about affordability in light of current consumer expenditures on communications services. "Affordability" was defined historically when the only telecommunications service purchased by typical households was a basic wireline dial tone line, with relatively low average household spending on telephone and cable TV. Today's consumers spend closer to \$200 per month on wireline voice, wireless voice and data, cable TV, and high speed Internet access.¹²¹ As a result, the revenue-generating opportunities associated with new broadband infrastructure investment – including broadband Internet access, wireless backhaul, and video services – are considerably greater than they were in a voice-only wireline world. At the very least, the definition of "affordability" needs to be revisited, and with all of the additional revenue sources now available to support infrastructure in high cost areas, the continuing need for ongoing USF-type support may well be on the wane.

¹²¹ Gately Declaration at ¶ 8, Exhibit SMG-3.

The *Notice* proposes to use local rates for voice service at first and transition over time to a rate benchmark for voice and broadband.¹²² Ad Hoc urges the Commission to broaden the benchmark to other services sooner rather than later. In the past, “affordability” has been based upon the average monthly rate for basic local residential exchange service. However, the combined effects of horizontal expansion of the service delivery capability of the local ILEC network and the deregulation of most, if not all, local network services compels the adoption of a far broader benchmark, one that embraces *all services and associated revenues that are furnished utilizing the same common local access and transport network infrastructure*. “All” in this case includes any service – regulated or otherwise – that is supported by the core network, its access, transport and switching components, and should include all revenues derived from all such services.

Non-rural ILECs have a long tradition of deriving a large portion of their revenues from high-margin “optional” services and features while maintaining the basic local dial tone line rate at a relatively low level. Under rate of return regulation, the revenues derived from these “optional” services and features would be included within the total revenue requirement of the ILEC, such that the revenues derived in this manner could subsidize lower, “residually priced” basic residential dial tone. As ILECs have expanded their non-regulated “optional” services and features, including vertical central office features, long distance, and Internet access, the revenue contributions of those services have also expanded. More recently, video has also been added to this list, as the larger ILECs – mainly AT&T and Verizon – have expanded the capacity of their access

¹²² *Notice* ¶ 573.

infrastructure to include video-capable delivery. All of these services utilize common plant and should therefore be included within the benchmark.

3. Proposals to Increase SLCs are Inherently Inconsistent With the Design and Operation of SLCs

The *Notice* points out that many parties in this proceeding have proposed increases in the SLCs or SLC caps to generate revenues to offset any revenue reduction resulting from ICC reform. But the caps on SLCs in the Commission's rules are not ceilings up to which prices may float based upon a carrier's discretion. They are caps on the amount of loop costs that may be recovered from the SLC element based upon each individual carrier's cost characteristics.¹²³ Whether the SLC element in a particular carrier's tariff is "at" or "below" the cap is a function of that carrier's particular loop costs (density, loop length, etc.) and nothing more.

Proposals to simply charge higher SLCs in order to keep ICC reform "revenue neutral" suggest that parties believe the SLC level charged by a LEC is something that is set at its discretion. It is not. In fact, the formula for setting SLC rates today is designed to recover the fully-distributed cost of loop facilities – including an allocation of overhead costs and profit¹²⁴ – because "users of the local telephone network should be responsible for the costs that they actually cause."¹²⁵ The proposals for SLC increases in this docket focus on "revenue neutrality" rather than "cost recovery" but both objectives must be considered as part of the Commission's design of a new ICC rate structure.

¹²³ 47 C.F.R. § 69.104 (for Rate of Return Carriers), 47 C.F.R. § 69.152 (for Price Caps Carriers) and 47 C.F.R. § 61.3 (d) and 61.3 (cc).

¹²⁴ *Id.*

¹²⁵ *First Reconsideration of 1983 Access Charge Order*, 97 FCC 2d. ¶ 7, at 686.

Costs directly associated with local telephone access generally fall into three broad categories – (1) those that are driven by the aggregate level of usage (*e.g.*, minutes-of-use (“MOUs”)) of the common local access and transport network; (2) those that are driven by the concurrent capacity demand placed on the common network; and (3) those that do not vary with either the usage (MOUs) or capacity demand placed on the common network.

In the initial 1984 access charge rate structure, costs in the first two categories were classified as “traffic-sensitive” (“TS”) and were recovered via several traffic-sensitive rate elements. Costs that did not vary either with usage or demand were classified as “non-traffic-sensitive” (“NTS”) and were recovered in non-traffic-sensitive rate elements, principally the SLC.¹²⁶ To avoid “rate shock” to subscribers, and in response to intense political pressure,¹²⁷ the SLC was initially set well below cost by allocating some NTS costs to TS rate elements, the Carrier Common Line Charge (“CCLC”) being the primary example. But over time, the CCLC was phased out and the NTS costs that had initially been recovered via the CCLC were shifted to the SLC. The SLC, in turn, was based upon the interstate-assigned portion (roughly 25%) of the subscriber loop, the twisted-pair copper wire that connected the customer’s premises with the ILEC’s central office. The balance of the loop costs – the portion assigned to the intrastate jurisdiction – was expected to be recovered through local monthly exchange service rates set by the appropriate state regulatory body.

¹²⁶ See Notice ¶¶ 47-49, n.32 and orders cited therein.

¹²⁷ *MTS and WATS Market Structure*, Further Reconsideration of Third Report and Order, 97 FCC 2d 834, 836 n.3 (1984), *aff’d in part and remanded in part*, *NARUC v. FCC*, 737 F.2d 1095 (D.C. Cir. 1984), *cert. denied*, 469 U.S. 1227 (1985) (letter to FCC signed by 32 United States Senators delays imposition of end user SLCs).

At the time that access charges were first implemented, all ILECs were subject to rate-of-return regulation at both the federal and state levels. Although the jurisdictional allocation of rate base and operating costs was generally understood to be somewhat arbitrary, any misalignment could be made up under the rate of return regime. For example, if the jurisdictional cost assignment rules shifted more costs to the state jurisdiction and away from the interstate, a rate of return system would ensure that the revenue requirement associated with such a shift was captured in upward adjustments to state rates and corresponding downward adjustments in the interstate column. Additionally, at the time that access charges were introduced in the mid-1980s, the rate of inflation economy-wide was greater than the rate of productivity/efficiency gain within the telecom sector, such that ILECs were able to maintain revenue/cost parity by initiating "general rate cases" in both state and federal jurisdictions.

There have, of course, been dramatic changes in the economy, in regulatory regimes, and in the jurisdictional separation rules in the decades since access charges were initially put in place. Lower inflation overall and sector-specific technological innovation has operated to shift telecom costs downward, creating the potential for rate reductions. Competition has been introduced into the long distance market. NTS access charge rate elements have increased to better reflect the NTS nature of many costs. Competition in long distance together with lower access charges has helped to push long distance rates down aggressively. Rate of return regulation was replaced by price cap regulation at the federal level some twenty years ago, and the use of a

“productivity offset” or “X-factor” was abandoned some 11 years ago, thus permanently de-linking interstate revenues and interstate-assigned costs.¹²⁸

At the state level, while many states had initially adopted a form of price caps in place of rate of return regulation, most states in recent years have de-tariffed, forborne from regulating, or simply de-regulated most local exchange services and rates. State-level deregulatory initiatives were premised upon the theory that the local service market had become sufficiently competitive for the market, rather than any form of rate regulation, to constrain rates at competitive market levels. Of course, the validity of that theory has been heavily debated but regardless of its validity the result is a regulatory arena in which SLC increases for the purpose of ensuring revenue neutrality cannot be justified whether a local market is fully competitive or not.

If a local market actually is fully competitive, then competition would be constraining ILEC rates to competitive levels. In that case, end user rates – including both intrastate and interstate end user line charges like the SLC – would already be set at “what the market will bear” and could not be further increased without a loss of revenue when customers switch to the competitive alternatives which supposedly exist. Raising the interstate SLC cap or eliminating it altogether – two possibilities identified by the *Notice* in paragraphs 582-583 – would thus have no net effect on an ILEC’s combined intrastate/interstate revenue levels since marketplace forces would operate to force a corresponding dollar-for-dollar reduction in the intrastate component to keep the effective rate paid by subscribers at the competitive level.

¹²⁸ *CALLS Order*.

If, on the other, the local market is de-regulated even though it is *not* subject to price-constraining competition, then the limited number of providers (e.g., a telco and a local cable company) can be expected to establish rates higher than those in a competitive market and capable of generating excessive (monopoly) profits or rents. In those circumstances, the ILEC is already earning supracompetitive profits and needs no revenue supplement from an increase in the federally-regulated SLC. If the de-regulated LEC has set rates at profit-maximizing levels, then by definition a rate increase would be of no benefit (because the impact on demand would produce a net reduction in monopoly rents). If the de-regulated LEC has set rates at less than full profit-maximizing levels (perhaps in response to political rather than economic considerations), an increase in the interstate SLC could in theory offset revenue losses resulting from ICC reform, but that would merely allow supracompetitive profits to remain at the supracompetitive level instead of being reduced by ICC reform.

Finally, the ICC reform proposals on the record in this docket that would increase SLCs far above actual costs for residential and business lines, even in areas served by companies earning record-breaking profits, are inconsistent with the policies embodied in the Communications Act. As Ad Hoc pointed out in its November 2008 comments in this docket,¹²⁹ the Act requires the *elimination of implicit subsidies* and followed years of effort by the Commission to eliminate some implicit subsidies, identify those that remain, and recover them explicitly through the Universal Service Fund. Proponents of SLC increases are asking the Commission to take a giant step backwards and institutionalize

¹²⁹ Comments of Ad Hoc Telecommunications Users Committee, filed November 26, 2008.

the cross-subsidization of intercarrier services with charges from the basic access lines purchased by residential and business customers.

Moreover, while supporters of the proposals referenced by the *Notice* at paragraph 582 characterized their proposal as “modest increases” in the SLC caps, the rate increases that subscribers would face under those proposals are anything but modest.¹³⁰ The proposed increase in the SLC cap ranges from 20% (residence and business single line) to 25% (business multiline).¹³¹ In fact, however, for the vast majority of residential lines and in excess of 95% of business multilines, the actual SLC price is below (sometimes substantially below) the existing cap.¹³² The increase that subscribers would confront would be much greater than the “modest” 20% or 25% indicated in the proposals.

In the case of AT&T, for example, which provides service to approximately 50% of all ILEC multiline business subscribers, the average multiline business SLC across AT&T territory was \$5.41 as of June 2010. Per the FCC rules, that charge fully compensates AT&T for the interstate portion of the loop over which service is provided

¹³⁰ See *High-Cost Universal Service Support*, WC Docket No. 05-337, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Lifeline and Link Up*, WC Docket No. 03-109, *Universal Service Contribution Methodology*, WC Docket No. 06-122, *Numbering Resource Optimization*, CC Docket No. 99-200, *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *Intercarrier Compensation for ISP-Bound Traffic*, CC Docket No. 99-68, *IP-Enabled Services*, WC Docket No. 04-36, Order on Remand and Report and Order and Further Notice of Proposed Rulemaking, 24 FCC Rcd. 6475, 6630, App. A, ¶ 298 and 6828-29, App. C, ¶ 293 (2008), *aff'd Core Communications, Inc. v. FCC*, 592 F.3d 139 (D.C. Cir. 2010); *cert denied*, 131 S. Ct. 597, 626 (2010).

¹³¹ Single Line SLC increase of \$1.50 on a \$6.50 base ($1.50 / 6.50 = 21\%$); business multiline SLC increase of \$2.30 on a \$9.20 based ($2.30 / 9.20 = 25\%$).

¹³² *Trends in Telephone Service Table 1.3*

– including an apportionment of the overhead costs and profit.¹³³ The proposals referenced by the *Notice* to increase the cap on the multiline SLC would allow the actual price to increase from today’s cost-based average of \$5.41 to \$11.41 an amount more than twice as high (a 110% increase). In essence, the proposals cited by the *Notice* would require business subscribers to pay a pure subsidy element of as much as \$6.00 per month, reflecting the relatively high density and short loop lengths of local service plant in the District. Yet under the proposals, Verizon would be able to double the SLC for residential subscribers in the District, and almost triple it for business subscribers – all without regard to the lower cost of actually providing those services within the District.

Foisting this added and unjustified burden on business subscribers in the current economic environment while the RBOCs are earning excessive returns would be unjustifiable, not to mention completely at odds with current government efforts to assist businesses facing the worst economic downturn in decades.

4. The Connect America Fund Should be Reserved for Universal Service, not Revenue Neutrality

The *Notice* asks for comment on proposals to provide intercarrier compensation cost or revenue recovery from the Connect America Fund. Ad Hoc agrees with the *Notice* that the Commission should create a more objective, auditable standard to determine whether a provider qualifies for access to explicit universal service support for intercarrier compensation cost or revenue recovery.¹³⁴

¹³³ *Supra* n.126.

¹³⁴ *Notice* ¶ 587.

Ad Hoc also agrees that providers should first seek recovery through reasonable end user charges before receiving support under the CAF.¹³⁵ As discussed above, the Commission should develop a residential benchmark and use it to evaluate eligibility for additional revenue recovery or access to federal revenue recovery mechanism.

Ad Hoc does not support, however, any revenue neutrality or “make whole” mechanism that would convert access charge revenue or other intercarrier payments into permanent Connect America Fund (“CAF”) payments to carriers. The broadband subsidization contemplated for the CAF should be a response to specific broadband deployment milestones and outcomes, not an undifferentiated entitlement that results from the serendipity of having an alternative source of funding to replace ICC for this purpose. Second, there is no assurance that further acquiescence to carrier demands for additional funding will incent them to invest in broadband any more aggressively than previous concessions have done. If broadband is indeed essential infrastructure – and it is – its construction in under- and unserved areas needs to be expressly funded and directed in the most efficient and cost-effective way possible, not achieved via indirect inducements that have a demonstrated record of failure.

In fact, the continued reliance upon ICC as a source of universal service support has proven to be incompatible with the development of competition – an express goal of the 1996 Act. Technology-specific ICC rules have distorted economic choices among competing technologies, such as wireline vs. wireless and TDM vs. IP, and the vacillations and uncertainties associated with ICC reform – something that’s been going

¹³⁵

Id.

on for more than a decade – have discouraged investment and forced many innovative entrants out of business.

The policy linkage between USF and ICC has been longstanding and durable. Efforts to de-link these two mechanisms have been going on for many years and have been beset by considerable frustration. And while many proposals seek finally to sever that linkage, they seem to place great emphasize on an overarching “revenue neutrality” principle that would make carriers “whole” irrespective of how the use of ICC as a support mechanism is phased out. And that is hardly a formula for promoting competition and investment going forward.

C. Any fresh look rights must be symmetrical for carriers and end users

The *Notice* asks at para. 689 whether carriers should be permitted to abrogate their existing contracts or otherwise take a “fresh look” at existing commercial agreements if intercarrier compensation reforms require changes to carrier-to-carrier charges or SLCs. The *Notice* appears concerned in particular that “fresh look” rights for customers might allow wholesale and end user customers to avoid payment of early termination fees, presumably if intercarrier compensation reforms make existing contracts so burdensome that customers are incented to abandon or re-negotiate their existing contracts.

The Commission should address “fresh look” issues by requiring symmetry, meaning that service providers and their customers (whether wholesale or end user) should have the same “fresh look” rights. If the Commission allows carriers to unilaterally abrogate or reform their contracts to take advantage of ICC reforms that benefit them, customers must be allowed to do the same for ICC reforms that benefit

them. Contrary to the suggestion in the *Notice*,¹³⁶ this situation is no different from prior cases where the Commission found that end users would be denied the benefits of new or modified Commission policies absent a fresh look opportunity. If, for example, the Commission concludes that the elimination of MOU charges is necessary to achieve the goals of reform, those goals will be frustrated if carriers continue to impose MOU charges on end users. If the Commission increases SLCs to offset reduced MOU revenues, it cannot allow carriers to pass through increased SLCs and leave end users powerless if the carriers refuse to pass through reduced MOU charges as well. This was the mistake the Commission made in 1997 when it allowed interexchange carriers to pass through the then-new USF contribution factor but did not require carriers to pass through the offsetting access rate reductions that resulted when implicit subsidy costs were re-directed from access to the USF fund.¹³⁷ End users paid the price for that mistake. The Commission should not make it twice.

“Fresh look” rights are more important for end users than providers because carriers typically protect themselves contractually from regulatory changes that increase their costs via provisions that allow them to pass through even immaterial increases in regulatory charges on a dollar-for-dollar basis. Because so many telecom markets are not effectively competitive, many customers cannot obtain reciprocal provisions that pass through all decreases on the same basis or stabilize rates over the term of the contract. If the Commission undermines the mutuality of existing contracts by granting

¹³⁶ *Notice* ¶ 689, n.1113.

¹³⁷ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, 9209 ¶ 851 (1997) .

“fresh look” rights to providers but not end users, it will be insulating the ILECs’ pricing practices from what little competitive pressure exists.

Accordingly, the Commission should grant “fresh look” rights to both carriers and end users when ICC reform would cause a material change in contract terms and performance.

CONCLUSION

The Ad Hoc Telecommunications Users Committee urges the Commission to reform its universal service and intercarrier compensation rules in accordance with the analysis provided above.

Respectfully submitted,

ADHOC TELECOMMUNICATIONS USERS
COMMITTEE

By:

A handwritten signature in black ink, appearing to read "James S. Blaszak", written over a horizontal line.

Susan M. Gately
SMGately Consulting, LLC
84 Littles Ave,
Pembroke, MA 02359
(617) 598-2223

Dr. Lee L. Selwyn
Economics and Technology, Inc.
One Washington Mall, 15th Floor
Boston, MA 02108
(617) 598-2223

Economic Consultant

James S. Blaszak
Colleen Boothby
Andrew Brown
Levine, Blaszak, Block & Boothby, LLP
2001 L Street, NW, Suite 900
Washington, D.C. 20036
202-857-2550

Counsel for AdHoc Telecommunication:
Users Committee

April 18, 2011

Certificate of Service

I, Amanda Delgado, hereby certify that true and correct copies of the preceding Comments of AdHoc Telecommunications Users Committee were filed this 18th day of April, 2011 via the FCC's ECFS system and by email to:

Best Copy and Printing, Inc. (BCPI)
fcc@bcpiweb.com



Amanda Delgado
Legal Assistant
Levine, Blaszak, Block & Boothby, LLP
2001 L Street, NW
Suite 900
Washington, DC 20036

Appendix A

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket 10-90
A National Broadband Plan for Our Future)	GN Docket No. 09-51
Establishing Just and Reasonable Rates for)	WC Docket No. 07-135
Local Exchange Carriers)	
High-Cost Universal Service Support)	WC Docket No. 05-337
Developing a Unified Intercarrier)	CC Docket No. 01-92
Compensation Regime)	
Federal-State Joint Board on Universal)	CC Docket No. 96-45
Service)	
Lifeline and Link-Up)	WC Docket No. 03-109

Declaration

Of

Susan M. Gately

On Behalf of

AdHoc Telecommunications Users Committee

April 18, 2011

DECLARATION OF SUSAN M. GATELY

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- Exhibit SMG-22: *(Interstate Access Per Minute Charges by Carrier)*

**Before the
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In the Matter of)	
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Federal-State Joint Board on Universal)	CC Docket No. 96-45
Service)	
Lifeline and Link-Up)	WC Docket No. 03-109

DECLARATION OF SUSAN M. GATELY

INTRODUCTION

Susan M. Gately, of lawful age, declares and says as follows:

1. My name is Susan M. Gately; I am President of SMGately Consulting, LLC (SMGC), 84 Littles Avenue, Pembroke, MA 02359. SMGC is a consulting firm specializing in telecommunications and public policy. I have participated in numerous proceedings before the Federal Communications Commission (“FCC” or “Commission”) dating back to 1981 and have appeared as an expert witness in state proceedings before state public utility

1 commissions. My Statement of Qualifications is annexed hereto as Attachment 1 and is
2 made a part hereof.

3 2. I was asked by the AdHoc Telecommunications Users Committee to undertake
4 research in support of Initial Comments that will be filed on the Committee's behalf on April
5 18, 2011. This declaration sets forth the results of that research and analysis and provides the
6 supporting documentation for many of the facts and figures cited in those Initial Comments.

7 3. The data replicated and synthesized in this Declaration come from the documents
8 and data produced by the FCC, USAC, the Bureau of Labor Statistics (BLS), the US Census
9 Bureau, the National Regulatory Research Institute, various state utility commissions and the
10 websites of various ILECs.

11 4. The commentary accompanying the attached data is methodological rather than
12 qualitative. Notations regarding the source of the materials found in each of the
13 accompanying exhibits are located on the covering sheet for each exhibit.

14 DATA RELATED TO THE SIZE AND GROWTH IN THE USF FUND

15 5. Table SMG-1 contains a summary of USF disbursements from 1996 to 2010 for
16 each component of the High Cost Fund, as well as subtotals for various periods referred to in
17 the text of the AdHoc Comments. The source of the data for the years 1996 to 2009 is Table
18 3.1 of the *Universal Service Monitoring Report*; CC Docket No. 98-202: 2010 (Covering
19 data received through October 2010). Prepared by Federal and State Staff for the Federal-
20 State Joint Board on Universal Service in CC Docket No. 96-45. Data from the year 2010
21 comes from the *Notice* Figure 2.

6. Table SMG-2 contains a summary of USF disbursements from 1996 to 2010 for the Low Income Fund, as well as subtotals for various periods referred to in the text of the AdHoc Comments. The source of the data for the years 1996 to 2009 is from Table 2.2 of the *Universal Service Monitoring Report*; CC Docket No. 98-202: 2010 (Covering data received through October 2010). Prepared by Federal and State Staff for the Federal-State Joint Board on Universal Service in CC Docket No. 96-45. 2010 data from Universal Service Administrative Company, Quarterly Administration Filings for 2011, Second Quarter (2Q) Appendices at M04 (filed Jan. 31, 2011) (USAC 2Q 2011 FILING), available at <http://www.usac.org/about/governance/fcc-filings/2011/quarter-2.aspx>.

DATA RELATED TO COST AND REVENUE TRENDS IN THE INDUSTRY

7. Exhibits SMG-1 and SMG-2 contain data demonstrating the decline in costs for the production of telecommunications services over the past decade during the period when the support provided by the HCF portion of USF almost doubled. Exhibit SMG-1 displays the BLS Producer Price Indices for the Communications Equipment Manufacturing and Telephone Apparatus Manufacturing categories (Series 3342 and 33421) both of which reveal declines. (Source: US Department of Labor, Bureau of Labor Statistics, Producer Price Indices accessed at <http://www.bls.gov/ppi/data.htm>) Exhibit SMG-2 displays the BLS labor productivity indices for wireline and wireless services over the period 1996 to 2008 – revealing a level of labor productivity in both the wireline and wireless segments that vastly outperformed the US non-farm productivity throughout the period. (Source: Department of Labor, Bureau of Labor Statistics, Current Employment Statistics Database, accessed at

1 <http://www.bls.gov/ces/>) Exhibit SMG-2 also contains BLS reports on wireline and wireless
2 segment employment levels from 2001 to present, and end user switched access line counts
3 (traditional and VoIP) and wireless subscriber counts for the same period.

4 8. Exhibit SMG-3 contains summary data detailing increasing average revenue per
5 subscriber over the past decade. This data reveals that while the number of traditional circuit-
6 switched LEC voice access lines may have been declining, the revenue from those lost lines
7 has been replaced with revenue from other sources. Included in Exhibit SMG-3 is BEA
8 data revealing that annual expenditures on telephone, internet access and wireless service
9 combined increased from \$146-Billion in 2000 to \$215-Billion (FCC *Trends* Table 3.3).

10 Expressed on a per household per month basis the increase equals about *\$36 per month in*
11 *additional revenues* available spent on average *per household* during that same period. The
12 average combined expenditures increased from \$116 per month to \$152 per month. (FCC
13 *Trends* Table 3.4) Part of this is a result of the large increase in the percentage of households
14 purchasing high-speed internet access (increased from 4% to 63% from 2000 to 2009) (FCC
15 *Trends*, Chart 2.5.) and part is a result of the tremendous growth in wireless revenues during
16 this same period. The FCC also reports data it obtains from the TNS database (FCC *Trends*
17 Table 3.1) that reveals an even greater revenue increase – a \$49 per month increase in
18 average household telecom spend between 2000 and 2008 (increasing from a \$76 monthly
19 average in 2000 to a \$125 average in 2008). A separate FCC analysis of expenditures on
20 cable TV and Internet access services furnished by cable TV companies reports an average
21 spend among cable TV customers for video and Internet services, as of January 1, 2009 of
22 \$107.64 per month for “doubleplay” video + Internet. (FCC *Cable Pricing Report*, Table
23 11) That number, when combined with the “landline telephone service” and “cellular

telephone service” monthly spends reported in Table 3.4 of the *Trends* report yields total per household spending on voice (wireline and wireless), internet access and video of more than \$200 per month.

DATA RELATED TO LOCAL SWITCHING SUPPORT

9. Table SMG-3 details the results of an analysis of interstate minute of use of RLECs located in Iowa. The table documents a handful of carriers that reported interstate access minute of use that increased at least five fold in a single year. Each of the carriers identified on Table SMG-3 continues to receive LSS revenue to this date. Exhibit SMG-4 provides the source data for the analysis of growth in minutes of use and Exhibit SMG-5 contains Local Switching Support projected disbursements for 2011.

10. Exhibits SMG-6 through SMG-12 contain data relied upon in the analysis of the operations of the Adak Telephone Utility (ATE) and Windy City Cellular (WCC) (both owned by Adak Eagle Enterprise (AEE)) and referenced throughout the Initial Comments of the Ad Hoc Committee.

- Exhibit 6 contains a screenshot from the Adak Eagle Enterprises website documenting that AEE is the parent corporation for both the Adak Telephone Utility (founded in 2003) and Windy City Cellular.
- Exhibit SMG-7 documents that Adak Telephone Utility reported 165 working loops for the fourth quarter of 2010 and Windy City Cellular reported 49 “loops” for the same period.

- Exhibits SMG-8 and SMG-9 detail the USF High Cost Fund distributions for ATE and WCC respectively from the time they began receiving support dollars through February 2011.
- Exhibit SMG-10 contains additional material from the AEE website detailing that Windy City offers an “emergency” wireless service for \$10 per month, unlimited wireless service (including voice, texts, and data) for \$20.00 per month (roaming limited to 200 minutes per month) and a lifeline service with unlimited voice, text and data service with 600 roaming minutes per month for a net price of \$1.50 after lifeline subsidies of \$28.50 are subtracted from the monthly price.
- Exhibit SMG-11 contains the comparable information from the Adak Eagle Enterprises website detailing the basic residential wireline local service offering at \$40 per month (not inclusive of long distance charges).
- Exhibit SMG-12 contains yet more data from the AEE website detailing the purchase of a “T-7000” switch in 2006 (notably absent from the discussion is any indication that use of the switch is limited to the RLEC operations of the overall AEE LLC. Exhibit SMG-12 also contains data from the website of the Palmer Mutual Telephone Company in Iowa, reporting purchase of a T7000 switch one year earlier for \$160,000.

11. Table SMG-4 displays the results of an analysis of switching related metrics in 2009 for four separate RLECs from the same state (Arizona) with similar Category 1.3 loop counts (ranging from 3,295 to 4,030). The analysis was undertaken to evaluate what kind of

consistency, if any, existed in reported Central Office Switching expense and investment levels and LSS disbursements as reported for 2009 for the four RLECs. The table reveals little to no consistency in any category (switching plant in service, depreciation and amortization expense for switching equipment, operating expenses associated with switching equipment and level of LSS disbursements). Exhibit SMG-13 contains investment and expense data for the four carriers reported by NECA and Exhibit SMG-14 contains the USAC report of LSS disbursements for 2009.

DATA RELATED TO CORPORATE OVERHEAD LEVELS IN HCF

12. The *Notice* reports the results of a Commission's Staff Analysis of NECA 2010 USF Filing Data revealing an estimate that 13% of the total \$906,000 in 2010 HCLS disbursements were associated with corporate overhead expenses (totaling \$117 million). (*Notice*, at para.196 and n.311) This estimate does not include any of the corporate overhead expenses embedded in the LSS or ICLS disbursements (neither of which has any cap on the overall level of corporate overhead expenses), nor any of the overhead expenses that are incorporated in the development of the data to used to determine HCM and IAS disbursements, nor any of the corporate overhead expenses that are, by extension, included in the amounts going to CETCs as part of the "identical support" disbursements. Estimates of the totality of corporate overhead expenses collected through the HCF portion of the USF in a single year or a period of time can be performed with reference to that number. For example, it is not unreasonable to assume that as *a minimum* 13% of the *remaining* HCF disbursements are also driven by overhead expense. Applying a 13% factor to the entirety of

1 the 2010 HCF funding levels reveals that an amount in excess of a *half a billion* in USF
2 dollars were disbursed to ETC's for overhead expenses in just a single year. (\$4.2-Billion x
3 13% = \$546-Million) Alternatively, one could conservatively assume that corporate
4 expense recovery through the USF in the preceding nine years was limited to just the \$117-
5 million identified as associated with HCLS by the Commission for 2010, and that the level of
6 that funding in those prior years was approximately the same as the 2010 amount (even
7 though the size of the ILEC portion of the HCLS has been trending down as a result of the
8 operation of the indexed cap). In that case the overall corporate overhead expense recovered
9 through the USF fund in the past decade would have exceeded \$1-Billion.

10 DATA RELATED TO RLEC LOCAL SERVICE PRICING LEVELS

11 13. Different legislative and administrative regulations across the states make analysis
12 of regulations applying to RLECs and the prices they charge for local service an ambitious
13 project. Exhibit SMG-15 contains excerpts from a 2007 report prepared by the National
14 Regulatory Research Institute (NRRI) documenting the regulatory treatment of ILECs large
15 and small across the 50 states. The attached pages excerpted and reproduced as Exhibit 15
16 contains details of the regulatory treatment of RLECs in Idaho, where the many "Mutual"
17 telephone companies are not even under PUC jurisdiction and Iowa where all RLECs have
18 been deregulated since 1983. Exhibit SMG-16 contains a table excerpted from a January,
19 2011 report from the PUC of Texas to the Texas State Legislature comparing local service
20 prices of several companies including Blossom Telephone Company (a small Texas RLEC
21 with a \$7 per month residential local service charge) and AT&T in Dallas (where it charges

1 \$20 per month for local service in those areas where its prices have been deregulated).
2 Exhibit SMG-17 contains a table excerpted from an earlier report from the PUC of Texas
3 detailing local service prices of small carriers in Texas. Analysis of the table (reporting basic
4 residential local service prices for 54 RLECs) reveals about a dozen RLECs offering service
5 for between \$5- and \$6-per month, forty-seven offering prices of \$10 or less per month, and
6 only three identified as offering prices above the level of the FCC's reported nationwide
7 average of \$15.62. Exhibit SMG-18 contains a printout of the USAC Disbursement Data for
8 Blossom Telephone revealing that it received more than \$1-million in USF Disbursements in
9 2010 all while charging its rural subscribers \$13 per month less than AT&T was charging for
10 local service in Dallas.

11 DETAILS OF LEC OVEREARNING WHILE RECEIVING HIGH COST FUNDS

12 14. Exhibit SMG-19 reproduces a table from the most recent FCC *Trends* report
13 detailing interstate rates of return for Price Caps LECs for 2007 and 2008 (more recent data
14 has not yet been published) showing earnings averaging between 10.76% and 99.56% for
15 non-RBOC price cap carriers for 2008. Exhibit SMG-20 reproduces USAC HCF
16 disbursement data for 2008 for Windstream's operating company serving Lexington,
17 Kentucky -- the highest of the reported earners in Exhibit SMG-19. As reported in the
18 USAC data Windstream received \$4.9-million in IAS funds (and \$3.6-million in HCM
19 funds) in 2008. Since that time, and despite the clear evidence that no universal support was
20 necessary (with 2008 earnings of 100%, another \$4.9-million in 2009, \$5.4-million in 2010,

4 The foregoing statements are true and correct to the best of my knowledge, information and
5 belief.

Susan M. Gately

Table SMG-1
High-Cost Support Fund Payment History - 1996 to present
(In Millions of Dollars)

Year	High-Cost Loop Support	Safety Net Additive Support	Safety Valve Support	High-Cost Model Support	Long-Term Support	Interstate Common Line Support	Interstate Access Support	Local Switching Support	Total Support
1996	763	-	-	-	426	-	-	-	1,188
1997	794	-	-	-	470	-	-	-	1,263
1998	827	-	-	-	473	-	-	\$390	1,690
1999	864	-	-	-	473	-	-	380	1,718
2000	874	-	-	\$219	478	-	\$279	385	2,235
2001	927	-	-	206	492	-	577	390	2,592
2002	1,045	-	-	233	493	\$173	615	376	2,935
2003	1,085	\$9	\$0	234	504	415	622	396	3,265
2004	1,137	12	0	273	275	716	642	414	3,468
2005	1,219	15	4	292	0	1,149	691	426	3,796
2006	1,309	29	1	358	4	1,299	681	428	4,110
2007	1,402	38	3	346	0	1,419	645	435	4,289
2008	1,457	48	2	351	0	1,233	585	408	4,082
2009	1,424	53	5	331	-	1,537	563	381	4,292
2010*	1,379	79	6	310	-	1,675	545	359	4,353

Cumulative Totals:

1996 - 2010	\$16,505	\$283	\$21	\$3,151	\$4,088	\$9,615	\$6,444	\$5,170	\$45,277
1998 - 2010	\$14,949	\$283	\$21	\$3,151	\$3,193	\$9,615	\$6,444	\$5,170	\$42,826
2000 - 2010	\$13,258	\$283	\$21	\$3,151	\$2,247	\$9,615	\$6,444	\$4,399	\$39,418

Change:

2000 to 2010	158%	n/a	n/a	142%	n/a	n/a	195%	93%	195%
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Source Data: 1996 - 2009 -- *Universal Service Monitoring Report*; CC DOCKET NO. 98-202: 2010 (Covering data received through October 2010). Prepared by Federal and State Staff for the Federal-State Joint Board on Universal Service in CC Docket No. 96-45. Table 3.1. 2010 Data from USF / ICC Notice, Figure 2.

Table SMG-2
Total Low-Income Support Payments - 1996 to Present
(In Millions of Dollars)

Year	Life Line and Link-Up Low Income Support
1996	\$166.4
1997	\$161.3
1998	\$464.5
1999	\$480.2
2000	\$519.0
2001	\$589.4
2002	\$676.1
2003	\$716.4
2004	\$762.9
2005	\$802.0
2006	\$807.3
2007	\$823.3
2008	\$822.0
2009	\$1,025.3
2010*	\$1,294.4

Cumulative Totals:

1996 - 2010	\$10,111
1998 - 2010	\$9,783
2000 - 2010	\$8,838

Source Data: 1998 - 2009 Table 2.2 of the *Universal Service Monitoring Report*; CC Docket No. 98-202: 2010 (Covering data received through October 2010). Prepared by Federal and State Staff for the Federal-State Joint Board on Universal Service in CC Docket No. 96-45. 2010 data from Universal Service Administrative Company, Quarterly Administrative Filings For 2011, (2Q), Appendix M04 (filed Jan. 31, 2011) , available at <http://www.usac.org/about/governance/fcc-filings/2011/quarter-2.aspx>.

Table SMG-3
Analysis of Growth in Switched Access Minutes and Projected LSS Funding for 2011
Sample of Iowa ETCs

	2005 Interstate MOU	2006 Interstate MOU	Ratio of 2006 MOU to 2005 MOU	2011 Projected LSS Disbursement
Dixon Telephone Company (351150)	30,880,338	211,588,300	6.9	\$27,945
Farmers and Merchants Mutual Telephone (351166)	33,063,382	215,107,474	6.5	\$44,436
Farmers Telephone Company - Rice (351177)	27,085,487	201,674,886	7.4	\$95,820
Interstate 35 Telephone Company (351209)	39,797,194	241,755,774	6.1	\$131,508
Superior Telephone Company (351307)	525,037	58,321,503	111.1	\$19,500

Source Data: Table 8.3 Total ILEC Interstate Access Minutes by Study Area, found in the 2010 Universal Service Monitoring Report, CC Docket No. 98-202 and USAC Appendix HC08 LSS By State By SAC 2Q2011, at www.usac.org/about/governance/fcc-filings/2011/quarter-2.aspx. See Exhibits SMG-4 and 5 attached.

Table SMG-4
Analysis of COE Switching Investment, Depreciation Expense, Operating Expense and LSS
Funding Draw for Four Similarly Sized Arizona Study Areas: 2009 Data

	Arizona Telephone Company (452171)	Tohono O'Odham Utility (452173)	Southwestern Telephone (452174)	Gila River (452179)
Category 1.3 Loop Count*	3,295	3,925	3,629	4,030
COE Switching Plant in Service*	\$4.2-mil	\$2.9-mil	\$2.1-mil	\$2.0-mil
COE Switching Annual Depreciation and Amortization Expense*	\$228,730	\$146,735	\$59,360	\$370.27
COE Switching Dep and Amort. Expense as % of Investment	5.50%	5.10%	2.80%	18.40%
COE Switching Operating Expense*	\$121,557	\$320,711	\$122,238	\$893,486
Operating Expense to Investment Ratio	2.90%	11.20%	5.80%	44.50%
2009 Local Switching Support Projected Disbursements**	\$367,308	\$207,696	\$150,852	\$245,520
2009 LSS per Cat 1.3 Loop	\$111.47	\$52.92	\$41.57	\$60.92

Source Data: * Loop Count, COE Switching Plant in Service and Operating Expense all from FCC Wireline Competition Bureau file "LSS Cost Data 2005 – 2009.xls" found at www.fcc.gov/wcb/iatd/NECA.html, Accessed March 25, 2011. ** Projected Local Switching Support from USAC Appendix HC08 LSS By State By SAC 4Q2009, at <http://www.usac.org/about/governance/fcc-filings/2009/quarter-4.aspx>.

Declaration of Susan M. Gately
FCC WC Dockets 10-90, 07-135, 05-337, 03-109,
CC Dockets 01-92, 96 45 and GN Docket 09-51
April 18, 2011

DECLARATION OF SUSAN M. GATELY

EXHIBITS

Exhibit SMG-1

(Producer Price Index: Communications Equipment Manufacturing and Telephone Apparatus Manufacturing)

Source: US Department of Labor, Bureau of Labor Statistics, Producer Price Indices accessed at <http://www.bls.gov/ppi/data.htm>. Producer Price Indices for the Communications Equipment Manufacturing and Telephone Apparatus Manufacturing categories (Series 3342 and 33421)

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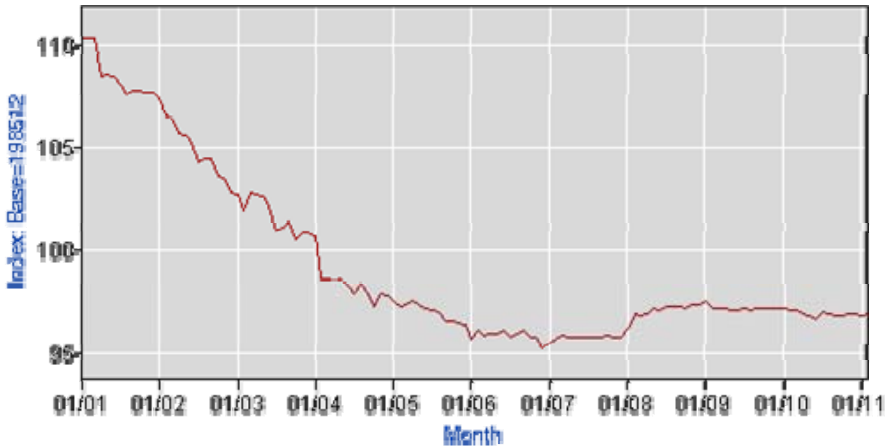
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Producer Price Index Industry Data

Series Id: PCU3342--3342--
Industry: Communications equipment mfg
Product: Communications equipment mfg
Base Date: 198512



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Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2001	110.4	110.4	110.4	108.5	108.6	108.5	108.1	107.6	107.8	107.8	107.7	107.7	108.6
2002	107.5	106.6	106.5	105.7	105.6	105.3	104.3	104.5	104.5	103.6	103.5	102.8	105.0
2003	102.7	101.9	102.8	102.7	102.6	102.1	101.0	101.1	101.4	100.5	100.9	100.9	101.7
2004	100.7	98.6	98.6	98.5	98.6	98.2	97.9	98.3	97.9	97.3	97.9	97.8	98.4
2005	97.5	97.3	97.4	97.5	97.4	97.2	97.1	97.0	96.6	96.6	96.5	96.4	97.0
2006	95.7	96.1	95.9	96.0	96.0	96.1	95.8	96.0	96.1	95.8	95.8	95.3	95.9
2007	95.5	95.7	95.9	95.8	95.8	95.8	95.8	95.8	95.8	95.9	95.8	95.8	95.8
2008	96.2	96.9	96.8	96.9	97.2	97.1	97.3	97.3	97.3	97.2	97.4	97.4	97.1
2009	97.5	97.2	97.2	97.2	97.1	97.1	97.2	97.1	97.2	97.2	97.2	97.2	97.2
2010	97.2	97.1	97.1	96.9	96.8	96.7	97.0	96.9	96.8	96.8	96.9(P)	96.9(P)	96.9(P)
2011	96.8(P)	96.9(P)											

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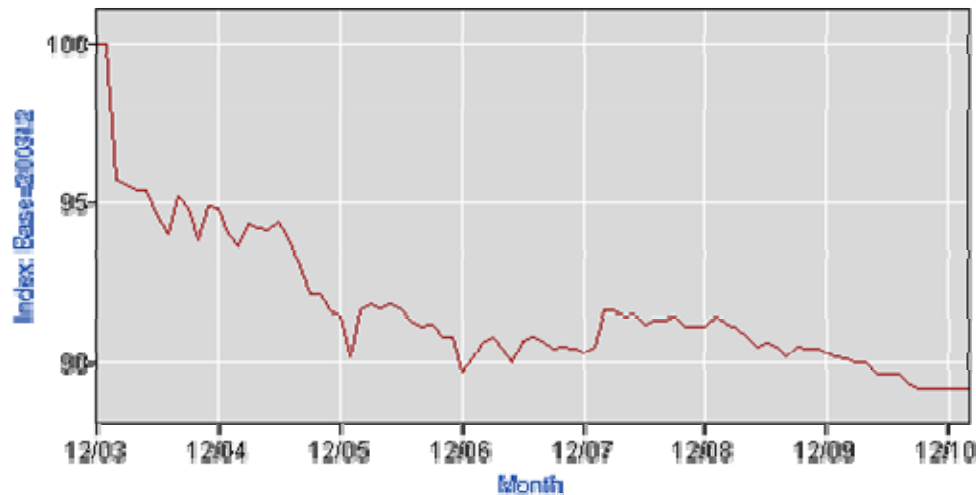
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Producer Price Index Industry Data

Series Id: PCU33421-33421-
Industry: Telephone apparatus mfg
Product: Telephone apparatus mfg
Base Date: 200312



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Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2003												100.0	
2004	100.0	95.7	95.6	95.4	95.4	94.5	94.0	95.2	94.8	93.8	94.9	94.8	95.3
2005	94.0	93.6	94.3	94.2	94.1	94.4	93.9	93.0	92.1	92.1	91.6	91.4	93.2
2006	90.2	91.6	91.8	91.7	91.8	91.7	91.3	91.1	91.2	90.8	90.8	89.7	91.1
2007	90.1	90.6	90.8	90.4	90.0	90.7	90.8	90.7	90.4	90.5	90.4	90.3	90.5
2008	90.5	91.6	91.6	91.4	91.5	91.2	91.3	91.3	91.4	91.1	91.1	91.1	91.3

P : Preliminary. All indexes are subject to revision four months after original publication.

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2009	91.4	91.2	91.1	90.8	90.5	90.6	90.5	90.2	90.5	90.4	90.4	90.3	90.7
2010	90.2	90.1	90.0	90.0	89.6	89.6	89.6	89.3	89.2	89.2	89.2(P)	89.2(P)	89.6(P)
2011	89.2(P)	89.2(P)											

P : Preliminary. All indexes are subject to revision four months after original publication.

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Exhibit SMG-2

(Wireline and Wireless Sector Employment Statistics: 2000 – 2011)

Source: Department of Labor, Bureau of Labor Statistics, Current Employment Statistics Database, accessed at <http://www.bls.gov/ces/>. Labor productivity indices for wireline and wireless services over the period 1996 to 2008

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Employment, Hours, and Earnings from the Current Employment Statistics survey (National)

Series Id: CEU5051710001
Not Seasonally Adjusted
Super Sector: Information
Industry: Wired telecommunications carriers
NAICS Code: 5171
Data Type: ALL EMPLOYEES, THOUSANDS

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Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2001	952.6	956.4	958.6	958.1	952.9	945.0	936.1	924.7	915.2	909.1	902.7	893.6	933.8
2002	877.2	868.0	862.2	853.0	848.7	844.0	834.1	826.7	815.5	813.1	809.4	792.8	837.1
2003	786.1	780.7	774.8	770.2	766.7	765.3	758.1	756.5	751.7	747.3	742.7	741.0	761.8
2004	738.4	738.6	736.2	730.7	727.1	727.1	724.1	718.0	705.6	700.8	699.0	699.1	720.4
2005	697.5	696.8	697.2	695.4	696.0	694.3	690.9	686.9	681.4	681.1	680.0	677.7	689.6
2006	672.2	673.4	673.0	674.5	675.7	670.1	666.7	668.3	664.5	662.8	663.1	666.4	669.2
2007	663.3	664.1	660.0	661.3	662.5	664.3	664.7	664.5	663.6	665.8	668.2	671.3	664.5
2008	673.2	673.0	672.5	670.6	670.8	670.8	668.3	666.9	662.5	658.7	655.8	653.6	666.4
2009	650.8	652.7	648.5	639.3	636.9	635.6	632.4	629.5	626.9	624.9	623.6	618.9	635.0
2010	614.7	611.6	607.4	600.0	598.7	598.8	595.3	596.0	592.7	591.1	592.6	590.1	599.1
2011	580.6	579.4(P)											

P : preliminary

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Employment, Hours, and Earnings from the Current Employment Statistics survey (National)

Series Id: CEU5051720001
Not Seasonally Adjusted
Super Sector: Information
Industry: Wireless telecommunications carriers (except satellite)
NAICS Code: 5172
Data Type: ALL EMPLOYEES, THOUSANDS

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Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2001	201.1	203.7	203.5	200.5	200.3	199.6	200.2	199.0	200.0	203.1	203.8	202.1	201.4
2002	200.2	201.7	199.0	198.8	197.1	196.2	196.8	196.5	193.9	195.7	196.5	195.6	197.3
2003	194.0	191.5	191.3	191.7	190.9	189.1	188.9	188.0	186.9	189.1	189.0	188.6	189.9
2004	190.3	189.3	189.1	189.1	188.6	188.0	189.0	189.2	187.9	190.1	191.4	194.0	189.7
2005	192.1	191.3	190.9	191.4	189.3	190.0	190.6	189.8	189.9	190.8	194.6	194.5	191.3
2006	196.6	197.0	197.1	196.9	196.9	198.4	199.7	199.6	202.3	204.4	206.9	206.9	200.2
2007	205.2	205.8	206.0	204.6	203.9	202.8	202.4	200.8	200.2	201.2	203.6	204.5	203.4
2008	200.7	200.2	200.3	199.9	201.1	201.8	201.4	201.3	200.3	199.7	200.0	198.9	200.5
2009	197.8	196.5	194.2	192.4	190.9	186.0	183.2	182.4	180.0	180.6	179.7	179.0	186.9
2010	175.2	173.6	171.4	170.3	168.6	169.2	168.2	168.7	167.6	170.6	170.6	172.0	170.5
2011	170.8	171.7(P)											

P : preliminary

Exhibit SMG-3

(Telecommunications Revenue per Subscriber Trends)

Source: *Trends in Telephone Service*, FCC WCB/IATD, September, 2010, Tables 3.3, 3.4, 3.2 and Chart 2.5 Accessed at <http://www.fcc.gov/wcb/iatd/trends.html>, *Implementation of Section 3 of the Cable Television Consumer Protection and Competition Act of 1992; Statistical Report on Average Rates for Basic Service, Cable Programming Service, and Equipment*, MM Docket No. 92-266, *Report on Cable Industry Prices* rel. February 11, 2011, at Table 11.

Trends in Telephone Service



*Industry Analysis and Technology Division
Wireline Competition Bureau*

September 2010

This report is available for reference in the FCC's Information Center at 445 12th Street, S.W., Courtyard Level. Copies may be purchased by calling Best Copy and Printing, Inc., Portals II, 445 12th Street S.W., Room CY-B402, Washington DC 20554 at 800-378-3160, facsimile 202-488-5563, or via e-mail fcc@bcpiweb.com. The report can also be downloaded from the Wireline Competition Bureau Statistical Reports Internet site at: www.fcc.gov/web/iatd/trends.html.

Table 3.3
Personal Consumption Expenditures (PCE)
(Expenditure Amounts Shown in Millions)

	Personal Consumption Expenditures 1/	Landline Telephone Services 2/	Cellular Telephone Services 3/	Internet Access Services 4/	Total Telephone and Internet Access	Telephone & Internet Access as a Percentage of PCE	As a Percentage of Total Telephone and internet Access		
							Landline	Cellular	Internet
1980	\$1,755,826	\$27,574	\$0	\$0	\$27,574	1.6 %	100 %	0 %	0 %
1981	1,939,506	30,889	0	0	30,889	1.6	100	0	0
1982	2,075,495	35,140	0	0	35,140	1.7	100	0	0
1983	2,288,576	38,639	0	0	38,639	1.7	100	0	0
1984	2,501,083	41,786	0	0	41,786	1.7	100	0	0
1985	2,717,608	45,877	101	0	45,978	1.7	100	0	0
1986	2,896,746	49,088	173	0	49,261	1.7	100	0	0
1987	3,096,960	51,637	242	0	51,879	1.7	100	0	0
1988	3,350,056	53,799	591	25	54,415	1.6	99	1	0
1989	3,594,490	56,783	1,352	50	58,185	1.6	98	2	0
1990	3,835,453	58,456	2,246	100	60,802	1.6	96	4	0
1991	3,980,073	60,915	3,088	200	64,203	1.6	95	5	0
1992	4,236,891	66,133	4,866	305	71,304	1.7	93	7	0
1993	4,483,594	68,585	6,423	412	75,420	1.7	91	9	1
1994	4,750,806	72,770	8,522	805	82,097	1.7	89	10	1
1995	4,987,280	73,893	11,274	1,611	86,778	1.7	85	13	2
1996	5,273,608	79,036	13,735	2,675	95,446	1.8	83	14	3
1997	5,570,626	87,443	15,706	3,575	106,724	1.9	82	15	3
1998	5,918,488	91,625	19,455	5,549	116,629	2.0	79	17	5
1999	6,342,784	95,796	24,204	10,055	130,055	2.1	74	19	8
2000	6,830,371	97,636	32,590	16,437	146,663	2.1	67	22	11
2001	7,148,807	96,817	40,763	18,243	155,823	2.2	62	26	12
2002	7,439,191	90,907	48,933	21,929	161,769	2.2	56	30	14
2003	7,804,013	85,499	54,667	26,128	166,294	2.1	51	33	16
2004	8,285,080	81,662	61,458	28,451	171,571	2.1	48	36	17
2005	8,819,002	76,677	69,390	29,888	175,955	2.0	44	39	17
2006	9,322,662	79,566	78,224	32,301	190,091	2.0	42	41	17
2007	9,826,438	76,053	85,940	38,606	200,599	2.0	38	43	19
2008	10,129,919	76,454	91,517	42,470	210,441	2.1	36	43	20
2009	10,089,069	76,600	94,543	44,144	215,287	2.1	36	44	21

Note: All series revised for all years

1/ Personal Consumption Expenditures (Series DPCERC).

2/ Represents the sum of two series: Landline Local Telephone Service (Series DLOCRC) and Landline Long Distance Telephone Services (Series DLDTRC).

3/ Cellular Telephone Service (Series DCELRC).

4/ Internet Access (Series DINTRC).

Source: Bureau Of Economic Analysis, National Economic Accounts, Table 2.4.5U. Personal Consumption Expenditures by Type of Product. See http://www.bea.gov/national/nipaweb/nipa_underlying/SelectTable.asp, last visited June 8, 2010.

Table 3.4
Personal Consumption Expenditures
Per Household Per Month 1/

	Households in July (Millions)	All Consumption Expenditures	Landline Telephone Services	Cellular Telephone Services	Internet Access Services	Total Telephone and Internet Access
1980	81.9	\$1,786	\$28	\$0	\$0	\$28
1981	83.5	1,935	31	0	0	31
1982	84.7	2,042	35	0	0	35
1983	85.1	2,241	38	0	0	38
1984	86.6	2,407	40	0	0	40
1985	88.2	2,568	43	0	0	43
1986	89.5	2,697	46	0	0	46
1987	90.7	2,845	47	0	0	48
1988	92.4	3,021	49	1	0	49
1989	93.8	3,193	50	1	0	52
1990	94.8	3,372	51	2	0	53
1991	95.5	3,473	53	3	0	56
1992	96.6	3,655	57	4	0	62
1993	97.9	3,816	58	5	0	64
1994	98.6	4,015	62	7	1	69
1995	100.0	4,156	62	9	1	72
1996	101.2	4,343	65	11	2	79
1997	102.3	4,538	71	13	3	87
1998	103.4	4,770	74	16	4	94
1999	105.1	5,029	76	19	8	103
2000	105.8	5,380	77	26	13	116
2001	106.9	5,573	75	32	14	121
2002	108.5	5,714	70	38	17	124
2003	112.1	5,801	64	41	19	124
2004	113.5	6,083	60	45	21	126
2005	114.4	6,424	56	51	22	128
2006	116.2	6,686	57	56	23	136
2007	117.7	6,957	54	61	27	142
2008	118.0	7,154	54	65	30	149
2009	118.0	7,125	54	67	31	152

1/ Expenditure amounts per month were calculated as the amounts shown in Table 3.3 divided by the number of households as of July.

Source: Number of households from the Census Bureau's Current Population Survey. Expenditure data from the Bureau Of Economic Analysis, National Economic Accounts, Table 2.4.5U. Personal Consumption Expenditures by Type of Product.
See http://www.bea.gov/national/nipaweb/nipa_underlying/SelectTable.asp last visited June 8, 2010.

Table 3.2
Average Monthly Household Telecommunications Expenditures
By Type of Provider

(Averages for all Households)

Year	Wireline Providers	Wireless Providers	Total
1995	\$51	\$7	\$58
1996	51	9	60
1997	57	11	68
1998	56	14	70
1999	55	17	72
2000	53	23	76
2001	51	29	80
2002	48	35	83
2003	47	41	88
2004	45	47	92
2005	44	53	97
2006	44	58	102
2007	45	68	113
2008	48	78	125

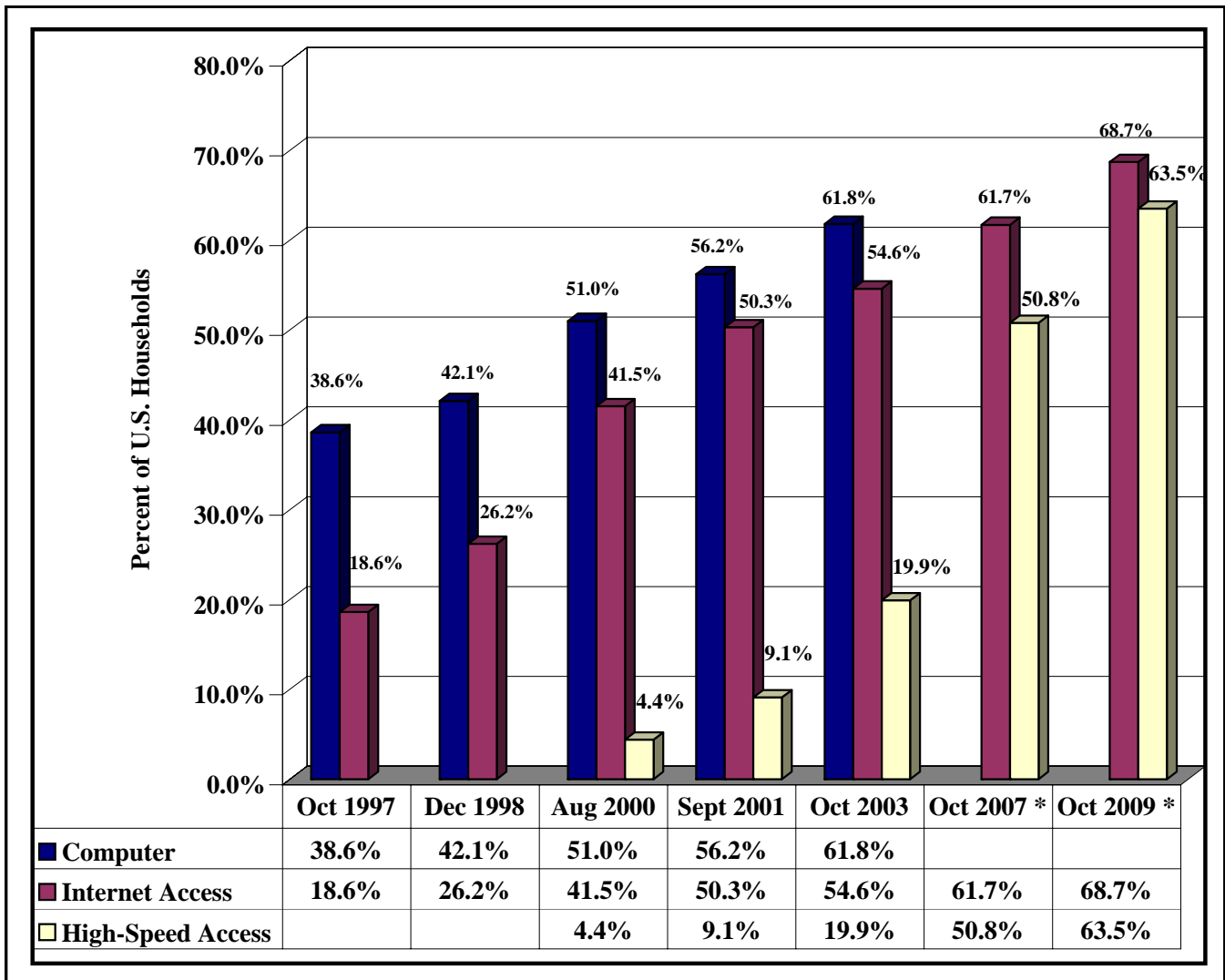
(Averages for only those Households Billed for Service)

Year	Wireline Providers	Wireless Providers	Total
1995	\$54	\$46	\$100
1996	56	45	101
1997	60	40	100
1998	61	41	102
1999	59	42	101
2000	59	46	105
2001	57	51	108
2002	55	56	111
2003	53	62	115
2004	49	67	116
2005	49	74	122
2006	48	78	126
2007	48	85	133
2008	50	92	142

Note: **Average monthly household expenditures are estimates based on sample data.** All households in the sample have wireline telephone service. Households in Alaska and Hawaii are excluded from the analysis. No effort was made to distinguish bundled prices from a la carte prices. For households taking bundled local and long distance from the same provider, the entire bill is generally considered local.

Source: Calculated by Industry Analysis and Technology Division staff using survey data from TNS Telecoms *ReQuest Market Monitor*™, *Bill Harvesting*®.

Chart 2.5
Percent of U.S. Households
With Computers, Internet Access, and High-Speed Access at Home
Selected Years (1997 - 2009)



* Data on computer penetration are not available for 2007 and 2009.

Source: U.S. Department of Commerce, National Telecommunications and Information Administration (NTIA), *Digital Nation: 21st Century America's Progress Toward Universal Broadband Internet Access* (February 2010), available through NTIA's website at www.ntia.doc.gov.

average monthly bill of \$63.92 in January 2009. Double-play customers who subscribed to both video programming and Internet access service paid a monthly average bill of \$107.64. Triple-play subscribers paid an average bill of \$145.10 per month for those services.

Table 11 Receipts and Prices by Service Package							
January 1, 2009	Overall	Non-Competitive	Subgroups of Effective Competition Communities				
			Overall	Second Operator	DBS	Wireless MVPD	LP Test
Average Monthly Receipts per Subscriber							
All services*	\$92.10	\$91.54	\$93.27	\$110.32	\$89.01	\$77.39	\$80.60
Video only service	\$63.92	\$63.94	\$63.90	\$66.15	\$63.29	\$63.73	\$60.75
Double play package	\$107.64	\$108.11	\$106.73	\$114.50	\$106.21	\$87.36	\$92.90
Triple play package	\$145.10	\$146.52	\$142.49	\$145.21	\$142.78	\$135.57	\$126.31
Average Price by Package							
Expanded basic	\$52.37	\$52.10	\$52.96	\$51.58	\$53.61	\$52.34	\$51.29
Double play package	\$86.86	\$85.75	\$89.02	\$87.96	\$90.14	\$82.19	\$84.79
Triple play package	\$116.74	\$116.97	\$116.27	\$108.71	\$118.99	\$116.38	\$117.64
Sources: Attachments 2, 11, and 19. * In addition to receipts from video only, double play, and triple play subscribers, receipts may include other video packages, non-video services such as Internet or telephony only, and other charges such as installation.							

33. Table 12 shows the percent of subscribers who take video service only compared to subscribers who take a video and Internet double play package or a triple play package. Over half of these subscribers (53 percent) took an enhanced package of services as of January 1, 2009. On average 39 percent subscribed to video only, 28 percent to a video and Internet double play, 25 percent to a triple play package, and 8 percent of subscribers subscribed to other packages or services.²⁷

Table 12 Subscribers by Service Package Percent of All Subscribers							
January 1, 2009	Overall	Non-Competitive	Subgroups of Effective Competition Communities				
			Overall	Second Operator	DBS	Wireless MVPD	LP Test
Video only service	39%	41%	35%	26%	37%	49%	48%
Double play package	28%	27%	30%	28%	32%	21%	26%
Triple play package	25%	24%	26%	39%	22%	21%	16%
Other Services*	8%	8%	9%	7%	9%	9%	10%
Sources: Attachment 19. * These include subscribers to video-telephony double play package and non-video services such as Internet and/or telephony only.							

²⁷ For this question, subscriber information was collected regarding basic service subscribers (who take video) and non-video subscribers. Other packages and services may include a video and telephony double-play as well as non-video subscribers taking Internet and/or telephony services only.

Exhibit SMG-4

(Historic ILEC Interstate Access Minutes of Use)

Source: 2010 *Universal Service Monitoring Report*, CC Docket No. 98-202, Table 8.3

UNIVERSAL SERVICE
MONITORING REPORT
CC DOCKET No. 98-202

2010

(Data Received Through October 2010)

Prepared by Federal and State Staff for the

Federal-State Joint Board on Universal Service in

CC Docket No. 96-45

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Table 8.3
Total ILEC Interstate Access Minutes by Study Area

Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
	ALABAMA - TOTAL		6,208,119,862	5,961,691,364	5,698,894,012	5,561,527,725	4,937,780,959
250282	BLOUNTSVILLE TEL CO	C	14,540,856	12,925,273	10,407,538	9,214,522	7,281,899
250283	BRINDLEE MOUNTAIN	A	39,247,247	36,368,068	38,261,742	30,974,372	24,122,149
250284	BUTLER TEL CO	C	33,172,023	32,125,116	30,947,345	31,684,676	29,362,795
250285	CASTLEBERRY TEL CO	A	3,421,667	3,952,043	3,380,920	3,729,600	3,661,577
250286	NATIONAL OF ALABAMA	C	5,811,668	5,881,059	5,192,308	4,723,400	4,062,178
250290	FARMERS TELECOM COOP	C	56,693,810	55,178,054	52,933,158	49,113,730	42,221,887
250295	KNOLOGY TOTAL COMM	C	14,990,833	13,718,899	13,065,442	12,996,730	12,731,030
250298	GULF TEL CO - AL	2	N/A	N/A	N/A	N/A	58,314,365
250298	GULF TEL CO - AL	C	196,705,078	183,282,618	163,954,116	150,481,315	65,704,699
250299	HAYNEVILLE TEL CO	C	10,469,026	9,054,406	6,065,462	4,690,771	4,370,825
250300	HOPPER TELECOMM. CO.	C	10,358,488	10,237,933	9,443,560	8,066,544	5,931,754
250301	FRONTIER-LAMAR CNTY	A	8,990,186	8,348,052	7,739,394	8,192,529	7,276,689
250302	WINDSTREAM AL	2	N/A	N/A	N/A	30,222,196	57,534,426
250302	WINDSTREAM AL	C	76,897,156	78,396,040	82,626,966	39,547,063	N/A
250304	MILLRY TEL CO	C	32,460,549	33,104,474	32,018,419	31,736,805	27,493,771
250305	MON-CRE TEL COOP	C	8,589,492	8,201,111	7,641,183	7,161,157	6,187,196
250306	FRONTIER COMM.-AL	2	44,570,309	38,472,394	37,290,779	37,526,863	34,101,881
250307	MOUNDVILLE TEL CO	C	3,524,779	3,060,311	2,721,444	2,761,071	2,615,367
250308	NEW HOPE TEL COOP	C	15,576,169	11,552,754	9,360,815	8,336,385	7,705,026
250311	OAKMAN TEL CO (TDS)	A	4,877,458	5,094,379	4,645,815	4,437,231	4,010,443
250312	OTELCO TELEPHONE LLC	A	24,557,065	23,294,781	22,263,127	18,698,274	14,863,901
250314	PEOPLES TEL CO	C	55,007,981	56,552,489	53,318,853	50,572,169	45,953,272
250315	PINE BELT TEL CO	C	11,562,667	11,166,210	10,200,174	10,135,805	9,723,768
250316	RAGLAND TEL CO	C	3,356,276	2,868,132	2,545,020	2,021,349	1,672,192
250317	ROANOKE TEL CO	C	21,997,321	20,889,787	18,831,329	17,299,443	14,424,657
250318	FRONTIER COMM-SOUTH	2	48,385,190	43,927,776	43,144,377	41,629,849	37,112,224
250322	UNION SPRINGS TEL CO	A	29,142,850	27,104,803	25,477,110	23,279,836	20,347,603
255181	SO CENTRAL BELL-AL	1	4,523,294,351	4,371,910,084	4,218,572,089	4,206,326,731	3,776,048,088
259788	CENTURYTEL-AL-SOUTH	2	531,883,022	504,140,518	464,397,713	415,325,091	351,622,773
259789	CENTURYTEL-AL-NORTH	2	378,036,345	350,883,800	322,447,814	300,642,218	261,322,524
	ALASKA - TOTAL		1,314,798,390	1,237,011,727	1,134,761,719	1,025,583,387	824,388,494
610989	ADAK TEL UTILITY	C	N/A	527,152	771,434	882,089	845,092
613000	ACS OF ANCHORAGE	2	N/A	N/A	80,580,223	293,708,141	229,469,259
613000	ACS OF ANCHORAGE	C	348,548,351	341,119,256	248,989,159	N/A	N/A
613001	ARCTIC SLOPE TEL	C	28,814,522	27,585,271	24,248,631	21,100,684	17,435,930
613002	BETTLES TEL CO INC	C	294,145	370,801	407,381	489,136	501,640
613003	BRISTOL BAY TEL COOP	C	5,189,199	5,219,717	8,671,278	7,932,485	6,608,403
613004	BUSH-TELL INC.	C	8,584,644	6,405,469	3,595,328	4,373,293	3,272,617
613005	CIRCLE TEL & ELEC	A	45,088	49,688	72,213	123,738	120,801
613006	COPPER VALLEY TEL	C	20,409,729	19,472,859	16,863,353	16,855,648	14,192,624
613007	CORDOVA TEL COOP	C	8,571,557	8,580,976	8,618,947	8,474,369	8,316,248
613008	ACS-FAIRBANKS, INC.	2	N/A	N/A	N/A	N/A	31,090,593
613008	ACS-FAIRBANKS, INC.	C	108,494,761	93,723,410	84,191,888	73,861,172	30,537,114
613010	ACS-N GLACIER STATE	2	N/A	N/A	N/A	N/A	58,743,810
613010	ACS-N GLACIER STATE	C	185,485,185	180,684,386	169,293,881	146,472,110	60,824,125
613011	INTERIOR TEL CO INC	C	67,321,211	57,136,230	46,703,345	43,748,873	38,259,025
613012	ACS-AK JUNEAU	2	N/A	N/A	N/A	N/A	14,388,373
613012	ACS-AK JUNEAU	C	61,172,849	53,053,141	42,020,278	36,803,504	15,695,492
613013	KETCHIKAN PUBLIC UT	C	38,649,154	32,769,908	27,564,530	25,960,360	21,886,402
613015	MATANUSKA TEL ASSOC	C	211,314,350	210,012,607	189,569,084	165,561,778	136,717,433
613016	MUKLUK TEL CO INC	C	22,680,714	19,992,670	14,176,950	12,500,753	7,498,804
613017	ALASKA TEL CO	C	35,539,281	33,073,136	28,899,225	28,340,417	24,173,929
613018	NUSHAGAK ELEC & TEL	C	6,827,271	7,596,425	7,936,918	8,822,576	8,375,760
613019	OTZ TEL CO COOPERATIVE	C	13,968,391	14,892,017	14,818,316	16,460,994	13,062,158
613020	ACS-N SITKA	2	N/A	N/A	N/A	N/A	17,387,373
613020	ACS-N SITKA	C	55,632,124	52,330,941	50,254,830	44,826,190	18,953,956
613022	ACS-AK GREATLAND	2	N/A	N/A	N/A	N/A	5,091,084
613022	ACS-AK GREATLAND	C	32,838,319	25,226,155	19,087,827	15,796,932	6,629,008
613023	UNITED UTILITIES INC	C	51,742,713	44,927,341	44,859,685	49,784,440	31,825,590

Table 8.3
Total ILEC Interstate Access Minutes by Study Area

Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
613025	YUKON TEL CO INC	C	1,546,255	1,242,056	1,261,542	1,260,362	1,079,906
613026	NORTH COUNTRY TEL CO	A	305,909	295,438	435,632	643,207	617,863
613028	SUMMIT TEL & TEL -AK	C	822,668	724,677	869,841	800,136	788,082
	AMERICAN SAMOA - TOTAL		14,886,649	19,130,814	19,339,324	19,086,670	17,997,558
673900	AMERICAN SAMOA	C	14,886,649	19,130,814	19,339,324	19,086,670	17,997,558
	ARIZONA - TOTAL		7,642,065,793	7,121,206,443	6,573,238,088	6,058,782,332	5,285,383,939
450815	HOPi TELECOMM, INC.	C	6,691,804	5,448,990	4,060,129	3,268,451	2,918,572
452169	SAN CARLOS APACHE	C	7,858,738	6,616,754	5,468,063	4,675,079	4,306,541
452171	ARIZONA TELEPHONE CO	C	9,316,452	9,069,462	8,120,294	8,068,950	6,345,717
452172	CITIZENS-FRNTR-RURAL	2	421,973,123	396,978,257	389,764,982	365,566,645	337,047,291
452173	TOHONO O'ODHAM UTIL.	C	4,854,382	4,413,819	3,729,950	3,297,850	2,769,717
452174	SOUTHWESTERN TEL CO	C	15,801,776	15,708,241	13,609,275	11,920,550	10,599,890
452176	VALLEY TEL COOP-AZ	C	29,023,363	27,093,162	24,270,523	21,700,107	18,868,566
452179	GILA RIVER TELECOM.	C	8,701,824	7,902,709	7,936,816	6,154,595	5,693,958
452191	ACCIPITER DBA ZONA	C	443,300	396,442	361,717	487,066	767,036
452200	FORT MOJAVE TEL, INC	C	4,937,504	4,846,568	4,780,105	4,522,757	4,112,479
452226	MIDVALE-AZ	C	4,366,167	4,595,353	4,425,840	4,602,879	4,274,020
452302	VERIZON CALIF-AZ	1	28,237,977	24,394,724	20,872,803	17,142,988	14,357,335
453334	TABLE TOP TEL CO	C	20,118,072	19,188,038	16,807,342	14,740,030	12,329,141
454426	CITIZENS-FRNTER-WH MT	2	134,156,347	123,988,973	109,028,035	92,686,610	79,405,387
454449	NAVAJO-AZ-FRONTIER	2	101,370,155	88,990,658	69,771,419	66,542,781	60,373,722
455101	QWEST CORP-AZ	1	6,833,976,223	6,372,116,935	5,879,623,471	5,422,374,736	4,709,778,956
457991	SADDLEBACK COMM CO	C	10,238,586	9,457,358	10,607,324	11,030,258	11,435,611
	ARKANSAS - TOTAL		4,054,091,978	3,870,660,150	3,433,636,276	3,098,533,850	2,662,866,667
401142	CENTURYTEL NW-AR-RUS	2	N/A	N/A	N/A	N/A	92,472,462
401142	CENTURYTEL NW-AR-RUS	C	320,855,793	290,616,436	258,901,271	225,867,218	99,164,683
401143	CENTURYTEL NW-AR-SIL	2	N/A	N/A	N/A	N/A	18,777,501
401143	CENTURYTEL NW-AR-SIL	C	75,115,033	68,948,968	59,477,990	51,068,064	20,538,430
401144	CENTURYTEL-CENTRAL A	2	N/A	N/A	N/A	N/A	74,295,877
401144	CENTURYTEL-CENTRAL A	C	263,732,666	236,710,799	200,891,982	185,245,409	78,577,681
401691	WINDSTREAM AR	2	N/A	N/A	N/A	119,658,408	217,579,388
401691	WINDSTREAM AR	C	326,861,995	342,395,097	272,922,662	125,391,747	N/A
401692	ARKANSAS TEL CO	C	24,365,152	24,376,565	22,091,932	21,664,091	18,611,524
401697	CENTRAL ARKANSAS TEL	C	7,927,303	6,719,050	5,706,143	5,017,085	4,490,350
401698	CLEVELAND COUNTY TEL	C	6,224,250	5,523,466	5,614,473	5,498,215	4,835,396
401699	DECATUR TEL CO INC	C	4,607,143	4,546,787	4,054,019	3,737,121	2,756,672
401702	SOUTH ARKANSAS TEL	C	11,778,395	10,822,039	9,164,874	7,768,540	7,447,833
401704	LAVACA TEL CO-AR	C	4,344,053	3,700,281	2,983,076	2,611,147	2,276,087
401705	CENTURYTEL- ARKANSAS	2	N/A	N/A	N/A	N/A	22,107,151
401705	CENTURYTEL- ARKANSAS	C	68,386,709	61,336,925	54,085,711	50,974,017	23,035,202
401709	MADISON COUNTY TEL	C	13,145,458	13,044,796	12,720,455	14,883,418	12,715,557
401710	MAGAZINE TEL CO	A	2,669,334	2,354,396	1,921,162	1,688,768	1,420,915
401711	CENTURYTEL-MTN HOME	2	N/A	N/A	N/A	N/A	31,438,529
401711	CENTURYTEL-MTN HOME	C	88,272,896	83,180,615	77,736,733	73,626,741	33,530,644
401712	MOUNTAIN VIEW TEL CO	A	18,345,200	19,711,525	20,640,752	19,103,660	16,245,757
401713	NORTH ARKANSAS TEL	C	31,730,053	28,332,005	27,108,560	25,952,739	21,336,869
401718	PRAIRIE GROVE TEL CO	C	26,461,382	21,639,807	19,005,674	18,169,057	16,612,212
401720	CENTURYTEL-REDFIELD	2	N/A	N/A	N/A	N/A	1,276,141
401720	CENTURYTEL-REDFIELD	C	4,723,665	4,002,160	3,512,874	3,327,693	1,394,728
401721	RICE BELT TEL CO	C	2,240,396	1,715,240	1,349,242	1,157,764	996,720
401722	E RITTER TEL CO	A	12,654,205	11,925,112	11,028,594	10,633,276	8,056,777
401724	SW ARKANSAS TEL COOP	C	25,334,406	26,345,014	23,169,598	20,207,986	17,352,601
401726	TRI-COUNTY TEL CO-AR	C	23,168,293	20,740,135	18,053,421	18,298,286	15,077,919
401727	CENTURYTEL-SOUTH AR	2	N/A	N/A	N/A	N/A	2,590,495
401727	CENTURYTEL-SOUTH AR	C	9,473,410	8,404,767	6,499,896	5,999,253	2,657,484
401729	WALNUT HILL TEL CO	C	23,171,214	20,462,196	17,881,093	16,841,380	14,672,965
401733	YELCOT TEL CO INC	C	13,304,814	10,944,335	10,267,190	8,356,620	7,144,721
401734	ARKWEST COMM., INC.	C	15,456,574	14,175,749	11,665,256	10,480,139	9,998,645
403031	SCOTT COUNTY TEL CO	C	673,100	659,583	605,322	518,008	586,027
405211	SOUTHWESTERN BELL-AR	1	2,629,069,086	2,527,326,302	2,274,576,321	2,044,788,000	1,760,794,724

Table 8.3
Total ILEC Interstate Access Minutes by Study Area

Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
	CALIFORNIA - TOTAL		39,175,333,668	37,935,974,132	35,521,251,839	31,440,776,026	27,663,726,855
542301	CALAVERAS TEL CO	C	10,217,327	10,004,272	8,861,177	8,445,874	7,583,740
542302	VERIZON CA(CONTEL)	1	850,252,096	846,660,502	782,932,072	713,299,042	639,979,507
542308	CITIZENS-FRONTIER CA	2	274,836,133	252,712,788	243,087,528	232,332,898	209,777,519
542311	CAL-ORE TELEPHONE CO	C	10,485,493	9,498,326	10,105,697	11,464,837	9,522,620
542313	DUCOR TELEPHONE CO	C	2,613,807	2,960,013	2,814,795	2,341,219	2,464,254
542315	CZN-CA FRONTIER-GVN	2	N/A	N/A	2,121,597	26,146,917	26,666,938
542315	CZN-CA FRONTIER-GVN	C	35,118,055	33,170,423	27,362,334	13,446,554	N/A
542318	FORESTHILL-SEBASTIAN	C	7,126,849	6,765,749	6,226,671	5,500,304	5,299,256
542319	VERIZON-CA (GTE)	1	7,163,867,565	7,092,555,725	6,606,740,882	5,834,561,674	5,366,203,550
542321	HAPPY VALLEY TEL CO	C	10,010,652	11,327,567	6,849,322	7,711,320	5,867,285
542322	HORNITOS TEL CO	C	1,243,623	1,358,363	1,186,515	1,020,502	868,625
542323	WINTERHAVEN TEL. CO.	C	8,931,968	8,044,586	7,160,623	5,540,885	5,707,177
542324	KERMAN TEL-SEBASTIAN	C	6,115,022	5,444,211	5,281,694	4,810,411	7,594,235
542332	THE PONDEROSA TEL CO	C	13,296,777	12,224,960	10,512,499	9,108,487	8,459,884
542334	SUREWEST TEL.	C	281,643,070	254,379,250	227,576,498	203,374,639	154,327,216
542338	SIERRA TELEPHONE CO	C	44,791,839	45,225,148	39,465,897	34,605,031	32,370,027
542339	THE SISKIYOU TEL CO	C	14,257,966	14,448,326	13,387,251	12,566,705	10,748,691
542343	VOLCANO TEL CO	C	22,471,818	22,399,240	19,790,014	14,781,273	14,155,924
542344	VERIZON W-COAST-CA	1	39,705,744	37,878,559	34,038,911	30,386,071	28,037,031
542346	PINNACLES TEL CO	C	541,771	565,361	453,129	367,059	363,508
543402	CZN-CA FRONTIER-GST	2	36,927,101	34,969,552	35,090,062	31,274,805	30,175,682
544342	CZN-CA FRONTIER-TUOL	2	15,908,834	14,610,340	15,615,997	16,174,405	16,452,921
545170	PACIFIC BELL	1	30,324,970,158	29,218,770,871	27,414,590,674	24,221,515,114	21,081,101,265
	COLORADO -TOTAL		7,688,555,514	7,248,154,943	6,695,451,949	6,116,345,739	5,321,664,520
461835	SUNFLOWER TEL - CO	C	1,024,931	997,165	909,162	783,219	597,164
462178	AGATE MUTUAL TEL CO	C	311,431	367,518	287,469	233,257	220,426
462181	BIJOU TEL COOP ASSOC	C	3,416,188	2,881,332	2,706,337	2,725,496	1,927,268
462182	BLANCA TEL CO	C	5,986,802	6,864,156	6,906,698	7,023,925	7,578,299
462184	DELTA COUNTY TEL CO	C	33,242,187	33,258,781	30,949,043	28,794,482	24,400,776
462185	CENTURYTEL OF EAGLE	2	N/A	N/A	N/A	N/A	86,649,579
462185	CENTURYTEL OF EAGLE	C	267,686,786	252,037,196	215,854,502	193,394,484	87,056,728
462186	EASTERN SLOPE RURAL	C	14,684,322	13,092,586	11,234,382	9,261,352	7,929,048
462187	THE EL PASO CNTY TEL	2	15,177,042	15,127,977	15,356,918	14,495,552	11,459,892
462188	FARMERS TEL CO - CO	C	2,277,768	2,991,744	2,845,477	2,156,114	2,166,321
462190	HAXTUN TEL CO	C	4,070,269	3,862,469	3,294,717	2,859,660	2,207,480
462192	BIG SANDY TELECOM	C	3,349,794	3,158,541	2,703,909	2,463,810	2,095,554
462193	NUCLA-NATURITA TEL	C	5,429,604	5,485,071	4,807,104	4,138,731	3,641,174
462194	NUNN TEL CO	C	2,291,210	2,051,231	1,832,797	1,573,559	1,298,515
462195	SOUTH PARK TEL. CO.	C	1,102,192	1,066,094	764,738	571,302	487,481
462196	PEETZ COOP TEL CO	C	879,904	788,264	821,938	719,525	620,999
462197	PHILLIPS COUNTY TEL	C	5,489,347	5,364,569	4,886,164	4,038,831	3,312,474
462198	PINE DRIVE TEL CO	A	2,580,539	2,685,035	2,642,694	2,357,333	1,932,362
462199	PLAINS COOP TEL ASSN	C	4,400,086	4,149,949	3,664,268	3,342,864	2,751,529
462201	RICO TEL CO	C	783,532	812,250	808,664	723,632	472,901
462202	ROGGEN TEL COOP CO	C	613,900	499,971	504,398	428,220	324,150
462203	RYE TELEPHONE CO	C	8,428,398	7,469,542	7,565,866	7,062,132	6,058,557
462204	COLUMBINE ACQ CORP	C	6,562,896	7,369,297	6,616,330	5,778,131	4,930,447
462206	STONEHAM COOP TEL CO	A	217,656	188,069	168,895	149,105	133,515
462207	STRASBURG TEL CO	C	4,478,943	4,377,603	3,984,074	3,286,135	2,849,204
462208	CENTURYTEL-COLORADO	2	N/A	N/A	N/A	N/A	13,122,279
462208	CENTURYTEL-COLORADO	C	41,428,276	39,453,807	34,663,279	29,469,111	12,544,600
462209	WIGGINS TEL ASSOC	C	4,707,286	4,604,369	4,823,521	3,780,443	3,005,942
462210	WILLARD TEL CO	A	228,201	198,483	178,980	105,189	80,008
465102	QWEST CORP-CO	1	7,247,706,024	6,826,951,874	6,323,669,625	5,784,630,145	5,029,809,848
	CONNECTICUT - TOTAL		7,614,686,109	5,985,909,238	5,425,407,657	4,795,494,349	4,177,931,833
135200	SOUTHERN NEW ENGLAND	1	7,614,686,109	5,985,909,238	5,425,407,657	4,795,494,349	4,177,931,833
	DELAWARE - TOTAL		1,625,899,349	1,564,931,379	1,486,993,348	1,391,814,567	1,216,298,067
565010	VERIZON DELAWARE INC	1	1,625,899,349	1,564,931,379	1,486,993,348	1,391,814,567	1,216,298,067
	DISTRICT OF COLUMBIA - TOTAL		2,149,087,104	2,057,223,029	1,857,456,951	1,719,593,936	1,615,937,728

Table 8.3
Total ILEC Interstate Access Minutes by Study Area

Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
575020	VERIZON WA, DC INC.	1	2,149,087,104	2,057,223,029	1,857,456,951	1,719,593,936	1,615,937,728
	FLORIDA - TOTAL		29,664,676,432	27,598,773,098	24,812,141,685	22,233,771,815	19,038,199,763
210291	GTC, INC.	C	17,902,795	19,051,531	18,051,313	13,837,682	12,155,309
210318	FRONTIER COMM-SOUTH	2	13,697,985	12,768,725	12,906,307	12,726,268	11,974,899
210328	VERIZON FLORIDA	1	6,820,867,537	6,160,976,209	5,330,785,906	4,611,978,553	3,933,620,807
210329	GTC, INC.	C	25,313,947	25,513,965	24,984,040	21,764,073	19,128,630
210330	SMART CITY TEL LLC	C	134,190,475	133,393,679	141,885,774	141,658,335	149,481,409
210331	ITS TELECOMM. SYS.	C	20,584,866	17,975,078	14,629,877	10,488,087	8,176,063
210335	NORTHEAST FLORIDA	C	25,719,117	22,177,299	20,307,858	19,606,631	16,374,840
210336	WINDSTREAM FL	2	N/A	N/A	N/A	112,532,617	213,891,242
210336	WINDSTREAM FL	C	270,918,364	254,920,650	272,576,259	126,446,305	N/A
210338	QUINCY TEL CO-FL DIV	C	38,416,691	37,810,804	39,667,937	37,459,108	31,480,805
210339	GTC, INC.	C	97,620,172	84,580,852	80,655,293	75,933,027	67,839,221
210341	EMBARQ FLORIDA	1	6,389,976,437	5,712,456,526	5,045,525,654	4,433,580,142	3,749,788,852
215191	SOUTHERN BELL-FL	1	15,809,468,046	15,117,147,780	13,810,165,467	12,615,760,987	10,824,287,686
	GEORGIA - TOTAL		13,022,979,210	12,382,519,078	11,756,679,193	10,993,228,160	9,641,995,133
220324	VALLEY TEL CO, LLC	A	13,328,926	11,918,780	9,678,204	8,322,573	6,969,837
220338	QUINCY TEL CO-GA DIV	C	4,347,004	4,144,648	3,883,160	3,854,283	3,736,595
220344	ALMA TEL CO	C	17,488,203	17,479,789	15,553,074	12,991,224	12,355,846
220346	BLUE RIDGE TEL CO	C	33,949,435	27,338,657	26,892,077	27,759,413	25,296,743
220347	BRANTLEY TEL CO	C	16,664,502	16,210,846	13,437,619	12,373,023	10,716,014
220348	BULLOCH COUNTY RURAL	C	22,702,023	20,969,751	20,084,786	18,843,843	16,755,697
220351	CAMDEN TEL & TEL CO	C	126,704,556	131,762,180	121,317,143	106,366,755	92,803,013
220354	CHICKAMAUGA TEL CORP	C	16,358,641	12,238,185	12,593,547	11,436,050	10,333,116
220355	CITIZENS TEL CO - GA	C	15,779,164	11,429,708	9,606,126	8,393,788	7,006,603
220356	COASTAL UTILITIES	2	N/A	N/A	N/A	N/A	49,484,090
220356	COASTAL UTILITIES	C	206,956,875	199,066,056	187,471,867	148,344,756	55,912,381
220357	WINDSTREAM GA	2	N/A	N/A	N/A	80,596,007	149,710,575
220357	WINDSTREAM GA	C	194,742,690	184,438,857	175,085,933	81,810,700	N/A
220358	DARIEN TEL CO	C	15,399,434	13,890,873	13,789,981	12,678,777	11,522,541
220360	ELLIJAY TEL CO	C	49,611,266	35,763,285	28,921,117	26,605,644	22,074,007
220362	FRONTIER-FAIRMOUNT	2	5,238,473	4,510,146	4,579,300	4,421,049	3,896,270
220364	WINDSTREAM GA TEL.	A	22,791,775	21,471,783	19,704,744	19,887,283	18,037,595
220365	GLENWOOD TEL CO	C	2,983,460	3,331,463	2,685,045	2,218,894	1,759,574
220368	HART TEL CO	C	15,132,225	13,401,077	12,780,337	15,842,994	11,901,015
220369	COMSOUTH TELECOMM	C	19,969,495	19,666,456	20,330,851	11,560,878	10,288,684
220371	KNOLOGY - VALLEY	2	160,242,800	202,351,900	196,739,705	185,924,459	139,237,477
220375	NELSON-BALL GROUND	C	20,071,082	19,691,027	18,204,305	16,611,573	15,319,587
220376	PEMBROKE TEL CO	C	8,907,045	8,873,720	8,361,738	7,833,702	7,367,657
220377	PINELAND TEL COOP	C	28,930,568	25,610,788	23,974,645	24,191,953	20,778,736
220378	PLANTERS RURAL COOP	C	26,212,561	24,419,622	24,432,373	20,649,282	17,854,628
220379	PLANT TEL. CO.	C	28,184,121	26,438,455	24,641,841	20,438,334	17,788,032
220380	PROGRESSIVE RURAL	A	11,664,626	10,467,182	9,683,317	9,800,912	8,235,373
220381	PUBLIC SERVICE TEL	C	36,912,389	32,488,147	24,453,527	23,418,616	18,437,052
220382	RINGGOLD TEL CO	C	30,930,727	31,526,460	28,070,109	28,093,916	28,787,768
220386	WINDSTREAM STANDARD	2	N/A	N/A	N/A	88,885,601	170,744,811
220386	WINDSTREAM STANDARD	C	211,365,111	206,323,574	197,405,429	89,211,318	N/A
220387	FRONTIER GEORGIA LLC	A	51,167,291	39,161,053	36,964,328	36,276,326	30,717,754
220389	TRENTON TEL CO	A	16,832,652	16,457,845	15,647,013	27,522,558	22,411,130
220392	WAVERLY HALL, LLC	C	4,472,244	4,337,589	4,317,875	4,637,214	3,388,740
220394	WILKES TEL & ELC CO	C	26,249,391	21,559,281	23,963,531	22,374,762	19,214,139
220395	WINDSTREAM ACCUCOMM	A	10,216,368	9,942,410	8,352,256	7,815,432	6,967,291
223036	GEORGIA WINDSTREAM	2	282,417,978	276,739,912	264,178,624	235,255,091	190,468,258
223037	WINDSTREAM GA COMM	1	895,517,348	854,605,019	806,764,610	725,936,396	632,069,248
225192	SOUTHERN BELL-GA	1	10,372,536,761	9,822,492,554	9,342,129,056	8,804,042,781	7,771,647,256
	GUAM - TOTAL		235,126,457	257,458,581	262,443,993	221,234,612	161,652,226
663800	GTA TELECOM, LLC	C	235,126,457	257,458,581	262,443,993	221,234,612	161,652,226
	HAWAII - TOTAL		1,471,111,113	1,570,863,460	1,593,602,711	1,927,441,987	1,886,884,107
623021	SANDWICH ISLES COMM.	C	2,252,223	2,100,752	2,114,779	2,425,366	2,511,296
623100	HAWAIIAN TELCOM, INC	1	1,468,858,890	1,568,762,708	1,591,487,932	1,925,016,621	1,884,372,811

Table 8.3
Total ILEC Interstate Access Minutes by Study Area

Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
	IDAHO - TOTAL		2,360,924,963	2,213,617,613	2,050,268,803	1,860,296,209	1,624,144,351
472213	ALBION TEL CO-ATC	C	15,975,936	17,304,313	17,089,194	17,126,986	14,172,521
472215	CAMBRIDGE TEL CO	C	8,823,944	8,789,004	8,705,054	8,390,182	7,582,121
472218	CUSTER TEL COOP	C	7,949,008	8,219,247	7,807,856	7,235,989	6,411,325
472220	FILER MUTUAL TEL -ID	C	5,239,075	5,687,297	5,253,844	4,931,692	4,079,206
472221	FARMERS MUTUAL TEL	C	11,967,057	11,371,520	11,086,480	10,398,633	8,584,638
472222	Fremont Telcom	C	15,904,186	15,563,807	14,302,832	13,241,360	9,598,822
472223	CENTURY-GEM STATE-ID	2	N/A	N/A	N/A	N/A	2,508,191
472223	CENTURY-GEM STATE-ID	C	6,281,531	6,171,975	5,986,517	5,629,688	2,507,564
472225	CENTURYTEL OF IDAHO	2	N/A	N/A	N/A	N/A	6,190,492
472225	CENTURYTEL OF IDAHO	C	17,629,427	16,081,889	14,434,394	13,919,065	6,396,619
472226	MIDVALE TEL EXCH INC	C	4,776,806	5,200,532	4,539,219	4,623,885	3,213,827
472227	MUD LAKE TEL COOP	A	5,931,051	5,944,515	5,344,589	5,061,761	4,298,057
472230	POTLATCH TEL CO INC	C	13,471,122	12,527,925	7,889,482	7,627,764	7,058,676
472231	PROJECT MUTUAL TEL	C	24,657,378	18,642,354	16,233,365	19,616,569	21,905,408
472232	DIRECT COMM-ROCKLAND	C	4,934,117	5,269,163	4,793,581	4,335,215	3,114,727
472233	RURAL TEL CO - ID	C	1,575,644	1,407,910	1,257,003	1,376,947	1,023,765
472295	SILVER STAR TEL- ID	C	24,535,676	23,287,724	21,882,440	19,018,521	14,214,243
472416	VERIZON N'WEST-ID	1	472,711,674	447,089,442	440,042,288	383,667,599	356,449,726
472423	INLAND TEL-ID	C	1,790,095	1,689,890	1,612,867	1,692,573	1,578,985
474427	CITIZENS-FRONTIER-ID	2	70,047,780	66,592,788	62,712,918	61,650,335	54,811,804
475103	QWEST CORP-ID	1	1,518,637,762	1,416,534,267	1,291,082,278	1,174,992,349	1,005,437,457
475162	QWEST CORP-IDAHO	1	128,085,694	120,242,051	108,212,602	95,759,096	83,006,177
	ILLINOIS - TOTAL		16,401,230,788	15,579,556,644	14,860,489,280	13,700,941,305	11,910,546,019
340976	ADAMS TEL COOP	A	10,131,838	8,229,901	8,732,674	6,833,793	5,527,875
340978	ALHAMBRA-GRANTFORK	C	2,945,653	3,027,621	2,453,590	2,302,273	2,042,107
340983	CAMBRIDGE TEL CO -IL	A	4,086,674	4,024,960	2,621,520	1,802,592	1,617,941
340984	CASS TEL CO	C	9,271,753	8,219,433	5,470,466	3,693,647	2,637,752
340990	CLARKSVILLE MUTUAL	A	608,507	571,482	524,329	417,531	389,061
340993	CROSSVILLE TEL CO	A	1,913,300	1,635,553	1,339,748	1,233,346	1,442,571
340998	FRONTIER-DEPUE	A	1,464,388	1,460,587	1,249,902	951,149	932,052
341003	EGYPTIAN COOP ASSN	C	7,310,758	8,713,941	5,134,507	5,058,711	4,576,528
341004	EL PASO TEL CO	C	4,199,168	3,905,202	3,365,954	3,207,405	2,884,409
341009	C-R TEL CO	C	1,587,572	1,535,915	1,257,308	1,214,981	1,141,680
341011	FRONTIER OF LAKESIDE	2	1,663,220	1,488,382	1,614,950	1,169,389	908,197
341012	FLAT ROCK TEL CO-OP	C	1,640,867	1,793,958	1,584,344	1,706,239	1,626,877
341015	VERIZON NORTH-IL	1	1,430,859,778	1,313,979,390	1,154,256,735	1,008,104,849	873,026,604
341016	GENESEO TEL CO	A	19,800,077	26,011,451	29,025,478	65,128,470	73,366,266
341017	GLASFORD TEL CO	A	1,494,712	1,323,190	1,178,369	1,215,208	1,074,835
341020	GRAFTON TEL CO	C	2,013,911	2,524,926	2,497,157	2,634,776	2,261,276
341021	GRANDVIEW MUTUAL TEL	A	215,154	162,840	86,151	123,043	96,684
341023	GRIDLEY TEL CO	C	2,724,811	3,473,390	9,792,053	5,896,379	6,493,589
341024	HAMILTON COUNTY TEL	A	4,517,112	4,533,561	3,907,191	3,568,214	3,062,000
341025	SHAWNEE TEL. CO.	C	11,438,849	12,121,956	10,799,986	10,787,113	10,602,100
341026	HARRISONVILLE TEL CO	C	57,885,465	52,497,586	54,781,398	52,665,076	49,162,305
341029	HENRY COUNTY TEL CO	A	3,040,453	2,729,194	2,101,363	1,664,465	1,283,010
341032	HOME TEL CO-ST JACOB	C	2,295,137	2,175,842	1,913,953	2,110,827	1,947,409
341036	VERIZON N-IL(CONTEL)	1	292,985,307	269,814,479	237,698,264	208,314,706	172,917,170
341037	IL CONSOLIDATED TEL	2	N/A	N/A	N/A	86,724,188	193,664,602
341037	IL CONSOLIDATED TEL	C	176,832,714	170,012,098	170,435,749	95,575,611	N/A
341038	FRONTIER OF ILLINOIS	2	9,214,392	7,669,451	7,181,859	6,807,908	6,118,525
341041	KINSMAN MUTUAL TEL	A	214,181	218,640	175,153	164,040	192,520
341043	LA HARPE TEL CO	C	2,496,388	3,226,873	2,123,271	2,000,131	1,581,803
341045	LEAF RIVER TEL CO	C	1,114,799	885,361	706,586	704,709	586,422
341046	LEONORE MUTUAL TEL	A	184,576	184,533	184,536	252,029	197,591
341047	MCDONOUGH TEL COOP	C	9,399,331	8,076,296	6,625,781	7,061,829	5,800,834
341048	MENABB TEL CO	C	1,229,557	935,299	688,163	550,471	537,549
341049	MADISON TEL CO	C	14,050,409	13,880,815	12,781,092	12,440,918	12,348,447
341050	MARSEILLES TEL CO	A	38,695,671	11,372,709	12,021,492	11,909,244	6,396,766
341053	METAMORA TEL CO	A	9,345,483	8,719,570	8,781,740	8,282,002	6,311,308

Table 8.3
Total ILEC Interstate Access Minutes by Study Area

Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
341054	MID CENTURY TEL COOP	C	8,338,991	7,905,646	6,658,777	6,388,106	5,325,473
341055	FRONTIER-MIDLAND	2	11,335,904	11,358,304	9,094,555	8,827,182	8,447,161
341057	GALLATIN RIVER COMM.	2	N/A	N/A	N/A	N/A	48,273,207
341057	GALLATIN RIVER COMM.	C	154,356,491	143,802,967	132,985,502	122,420,680	53,369,812
341058	MONTROSE MUTUAL TEL	C	2,459,651	2,285,081	2,101,693	2,251,235	2,347,892
341060	MOULTRIE INDEPENDENT	C	1,305,767	2,853,054	2,804,478	1,165,672	890,663
341061	FRONTIER-MT. PULASKI	2	3,116,729	2,837,299	2,476,530	2,205,085	2,007,270
341062	NEW WINDSOR TEL CO	A	1,822,207	1,503,891	1,204,944	1,132,347	1,042,475
341065	ODIN TEL EXCH INC	C	9,086,738	8,784,581	7,204,864	6,712,630	5,723,328
341066	ONEIDA TEL EXCHANGE	C	1,364,633	1,439,193	1,438,422	986,952	927,908
341067	FRONTIER-ORION	2	3,899,031	3,337,886	3,114,499	2,918,884	2,807,075
341073	FRONTIER-PRAIRIE	2	2,057,416	1,903,138	1,788,729	1,866,918	1,787,343
341075	REYNOLDS TEL CO, INC	A	1,405,410	1,175,182	849,550	683,576	647,134
341079	FRONTIER-SCHUYLER	2	13,308,702	9,958,813	8,515,523	5,907,476	4,483,968
341086	TONICA TEL CO	A	1,290,215	1,182,762	956,256	677,741	686,441
341087	VIOLA HOME TEL CO	A	2,145,665	1,803,646	1,250,063	1,111,432	906,154
341088	WABASH TEL COOP, INC	C	12,432,924	12,338,739	12,888,579	13,711,480	13,979,746
341091	WOODHULL TEL CO	C	2,472,872	2,370,073	2,365,247	1,745,863	1,662,245
341092	STELLE TEL CO	A	240,803	259,116	252,844	243,131	240,322
341183	CITIZENS-FRONTIER-IL	2	247,848,507	222,763,177	203,128,605	182,974,884	165,936,565
343035	VERIZON S-IL(ALLTEL)	1	75,782,235	68,112,977	61,729,543	58,166,008	49,746,624
345070	ILLINOIS BELL TEL CO	1	13,706,287,932	13,110,444,734	12,632,587,265	11,654,566,761	10,084,550,548
	INDIANA - TOTAL		8,053,856,269	7,609,879,259	6,967,653,817	6,458,622,400	5,532,162,058
320742	BLOOMINGDALE HOME	C	1,817,005	1,783,096	1,726,200	1,778,806	1,545,640
320744	CAMDEN TEL CO - IN	A	3,049,928	3,371,252	2,995,825	2,835,532	2,704,317
320747	CENTURYTEL-CENTR IN	2	N/A	N/A	N/A	N/A	1,990,875
320747	CENTURYTEL-CENTR IN	C	7,237,069	7,001,537	5,787,878	5,025,227	2,264,153
320750	FRONTIER OF INDIANA	A	4,902,180	4,130,518	3,982,045	3,733,663	3,181,199
320751	CITIZENS TEL CORP	A	7,633,231	6,687,078	5,516,789	4,481,485	3,550,889
320753	CLAY DBA ENDEAVOR	C	25,451,108	22,847,652	21,614,342	20,145,612	16,906,174
320756	CRAIGVILLE TEL CO	A	2,403,205	2,066,758	2,116,968	1,833,442	1,429,548
320759	DAVISS-MARTIN/RTC	C	5,466,872	6,030,077	5,073,507	4,944,902	4,664,014
320771	GEETINGSVILLE TEL CO	A	1,246,960	1,033,475	1,054,546	854,328	778,906
320772	VERIZON N-IN	1	1,935,791,897	1,784,149,002	1,600,065,728	1,476,823,342	1,263,980,079
320775	HANCOCK TELECOM	C	23,653,433	23,243,522	17,529,089	16,570,588	14,038,328
320776	COMM CORP OF INDIANA	C	23,941,136	23,958,164	23,993,194	24,085,403	22,289,137
320777	HOME CO OF PITTSBORO	A	5,948,611	6,007,729	5,925,516	5,443,542	4,454,554
320778	HOME TEL CO INC	A	3,693,217	3,439,110	3,196,858	3,184,214	2,687,009
320779	VERIZON N-IN(CONTEL)	1	475,479,713	450,528,718	410,863,029	371,880,485	315,132,366
320783	LIGONIER TEL CO	C	11,671,847	9,497,507	7,666,558	6,663,002	5,332,697
320788	MERCHANTS & FARMERS	C	1,133,022	1,090,905	1,050,620	943,490	847,329
320790	MONON TEL CO	C	5,161,423	3,574,934	2,853,228	2,879,799	2,240,438
320792	MULBERRY COOP TEL CO	A	5,097,993	4,828,926	4,214,735	3,832,827	4,187,200
320796	NEW LISBON TEL CO	A	1,037,912	1,046,282	672,833	558,759	654,366
320797	NEW PARIS TEL INC	C	5,332,261	5,079,903	4,701,135	4,081,142	3,876,086
320800	NORTHWESTERN INDIANA	C	56,336,435	49,398,394	43,495,059	55,353,122	103,181,756
320801	CENTURYTEL OF ODON	2	N/A	N/A	N/A	N/A	1,475,653
320801	CENTURYTEL OF ODON	C	4,225,042	3,716,555	3,330,415	3,239,670	1,524,519
320807	PERRY-SPENCER RURAL	C	11,705,888	11,156,041	9,821,451	9,370,650	8,672,478
320809	COMM CORP OF S. IN	A	3,755,211	3,397,117	2,953,439	2,745,634	2,539,566
320813	PULASKI-WHITE RURAL	C	3,565,530	3,325,575	2,847,569	2,567,176	2,360,843
320815	ROCHESTER TEL CO	C	18,056,173	15,655,706	13,961,687	12,565,255	11,391,972
320816	S & W TEL CO	A	830,204	620,381	589,097	540,274	447,230
320818	SMITHVILLE TEL CO	C	68,405,098	61,599,839	54,446,657	52,312,966	48,330,437
320819	SE INDIANA RURAL	C	15,119,691	15,771,257	15,082,494	14,905,486	13,987,556
320825	SUNMAN TELECOMM CORP	C	21,949,379	21,684,789	20,117,034	19,343,672	16,674,877
320826	SWAYZEE TEL CO	A	2,130,502	1,902,587	1,624,343	1,556,910	1,250,394
320827	SWEETSER RURAL TEL	A	3,880,167	3,192,357	2,739,172	2,290,169	2,005,940
320828	FRONTIER-THORNTOWN	2	5,025,840	4,485,404	4,299,120	3,746,130	3,538,928
320829	TIPTON TEL CO	A	8,512,622	8,211,455	7,692,656	7,493,347	6,835,894

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320830	TRI-COUNTY TEL CO	A	5,674,171	5,810,545	5,483,265	4,987,122	4,370,582
320832	UTC OF INDIANA	1	715,804,478	663,266,969	642,668,803	602,024,275	461,784,142
320834	WASHINGTON CTY RURAL	C	11,960,609	11,462,288	10,713,565	9,883,219	8,030,428
320837	WEST POINT TEL CO	A	1,663,417	1,472,199	1,386,478	1,392,167	1,141,331
320839	YEOMAN TEL CO, INC	A	2,200,547	1,917,181	1,499,442	1,433,993	1,287,368
323034	VERIZON N-IN(ALLTEL)	1	21,415,119	19,979,488	19,159,861	18,394,104	15,236,504
325080	INDIANA BELL TEL CO	1	4,514,490,123	4,330,456,987	3,971,141,587	3,669,897,469	3,137,358,356
	IOWA - TOTAL		4,125,766,235	4,654,589,374	4,199,730,932	3,119,959,868	2,730,994,888
350739	REASNOR TEL. CO.	A	N/A	105,593,971	49,182,860	267,334	226,389
351096	HEARTLND-HICKORYTECH	C	40,102,302	36,925,547	33,144,268	30,323,772	24,473,047
351097	ANDREW TEL CO INC	A	518,331	598,473	540,254	471,348	346,634
351098	ARCADIA TEL CO	A	823,997	714,301	505,038	434,036	353,894
351101	ATKINS TEL CO, INC	A	1,495,795	1,307,923	1,303,173	1,170,317	996,252
351105	AYRSHIRE FARMERS MUT	C	608,548	512,786	457,405	420,308	321,583
351106	ALPINE COMM.	C	15,410,324	14,807,116	13,188,921	13,374,256	11,811,875
351107	BALDWIN-NASHVILLE	A	865,200	744,783	579,370	474,798	388,826
351108	BARNES CITY COOP	A	370,805	324,771	251,450	242,624	193,658
351110	BERNARD TEL CO INC	C	1,282,035	1,049,750	820,004	759,699	665,813
351112	BREDA TEL CORP.	A	3,245,171	2,412,055	1,960,048	1,811,932	1,499,674
351113	BROOKLYN MUTUAL TEL	A	2,673,347	2,402,125	2,065,625	2,156,644	1,803,948
351114	THE BURT TEL CO	A	1,022,730	922,625	748,346	657,019	581,375
351115	BUTLER-BREMER MUTUAL	A	4,673,744	4,424,304	5,205,779	3,261,005	2,538,920
351118	CASCADE COMM. CO.	A	3,715,853	3,263,803	2,779,753	2,490,020	2,126,968
351119	CASEY MUTUAL TEL CO	A	1,629,395	1,269,460	994,265	649,247	426,019
351121	CENTER JUNCTION TEL	A	275,406	207,396	168,133	146,365	114,479
351125	CENTRAL SCOTT TEL CO	A	14,442,936	14,671,652	13,022,651	12,303,852	9,914,583
351126	CenturyTel-Chester	A	754,935	570,751	509,313	473,754	424,936
351127	FRONTIER IOWA	2	144,791,377	128,370,020	110,127,831	101,908,955	98,968,600
351129	CITIZENS MUTUAL TEL	C	7,773,005	8,181,551	7,844,211	7,272,656	6,306,607
351130	CLARENCE TEL CO	C	1,762,409	1,462,950	1,148,828	1,135,847	864,569
351132	CLEAR LAKE INDEPEND	C	13,820,544	13,806,787	14,302,376	12,484,621	9,755,724
351133	C-M-L TEL COOP ASSN	A	1,724,893	1,578,660	1,413,737	1,340,917	1,152,385
351134	COLO TEL CO	C	1,539,371	1,451,838	1,181,183	1,081,662	840,083
351136	COON CREEK TEL CO	A	1,108,842	1,117,304	902,356	797,613	725,270
351137	COON VALLEY COOP TEL	A	1,344,331	1,102,022	922,102	914,906	698,386
351139	COOPERATIVE TEL CO	A	2,625,287	2,483,998	2,096,262	1,925,915	1,589,599
351141	CORN BELT TEL CO	A	1,817,110	1,914,025	1,642,860	1,499,294	1,210,544
351146	CUMBERLAND TEL CO	A	921,736	750,920	601,444	538,571	414,711
351147	DANVILLE MUTUAL TEL	A	2,092,465	2,062,011	1,948,942	1,628,375	1,177,720
351149	FARMERS (DEFIANCE)	A	817,793	689,938	569,719	479,266	411,788
351150	DIXON TEL CO	A	30,880,338	211,588,343	138,567,729	841,405	650,289
351152	DUMONT TEL CO	A	5,319,641	2,472,691	2,003,538	1,863,340	1,580,228
351153	DUNKERTON TEL COOP	A	1,537,641	1,481,618	1,237,612	1,035,680	751,948
351156	EAST BUCHANAN COOP	C	2,173,003	1,812,690	1,644,117	2,275,374	1,908,287
351157	ELLSWORTH COOP ASSN	A	1,397,975	1,381,352	1,166,361	1,121,013	1,061,040
351158	MINBURN TELECOMM.	C	2,140,574	1,806,698	1,696,133	1,521,909	1,580,194
351160	F&B COMMUNICATIONS	A	2,660,138	2,568,180	2,448,713	2,027,282	1,680,528
351162	FARMERS COOP TEL CO	A	2,464,622	2,497,937	2,039,724	1,980,569	1,711,098
351166	FARMERS & MERCHANTS	A	33,063,382	215,107,474	127,739,026	1,210,626	1,066,385
351167	ITS-IOWA TELECOM-NO	2	278,926,698	239,293,553	210,735,111	198,000,964	169,044,647
351168	FARMERS MUTUAL COOP	A	8,584,736	6,595,248	4,832,570	4,246,958	3,611,710
351169	FARMERS MUTUAL COOP	A	1,710,352	1,557,904	1,196,980	1,121,728	888,389
351170	ITS-IOWA TELECOM-SYS	2	164,261,951	144,844,210	126,670,366	115,035,414	102,007,856
351171	FARMERS MUTUAL JESUP	A	3,660,087	3,677,377	3,051,398	2,840,188	2,507,531
351172	FARMERS MUTUAL TEL	C	4,359,201	2,768,462	3,075,362	2,847,949	2,376,711
351173	FARMERS MUTUAL COOP	A	4,483,752	4,165,523	3,694,650	3,591,867	3,043,337
351174	FARMERS MUTUAL TEL	A	3,115,491	3,025,918	2,638,294	2,337,109	1,913,461
351175	FARMERS TEL CO - BAT	A	814,590	808,969	585,994	565,301	397,687
351176	FARMERS TEL CO-ESSEX	A	1,857,242	1,637,784	1,328,861	1,174,364	909,579
351177	FARMERS TEL CO -RICE	A	27,085,487	201,674,886	272,846,189	2,802,568	2,493,069

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351178	ITS - IOWA TELECOM	2	208,631,014	178,409,029	155,405,478	146,242,106	120,392,791
351179	FENTON CO-OP TEL CO	A	788,112	759,078	675,333	597,675	497,494
351187	PARTNER COMM. COOP.	C	2,398,872	4,105,445	5,577,942	5,074,561	3,829,760
351188	GOLDFIELD TEL CO	A	1,054,553	1,111,153	877,547	824,928	677,193
351189	RIVER VALLEY TELECOM	A	2,134,111	1,926,027	1,654,162	1,549,552	1,314,023
351191	GRAND MOUND COOP TEL	A	1,165,523	1,264,253	1,017,431	919,990	760,145
351195	GRISWOLD CO-OP TEL	A	5,898,214	5,654,892	4,976,423	4,270,131	3,388,392
351199	HAWKEYE TEL CO	A	864,161	834,070	735,497	740,912	608,280
351202	HOSPERS TEL EXCH INC	A	1,821,446	1,582,267	1,356,329	1,191,736	1,030,419
351203	HUBBARD COOP ASSN	A	1,648,198	1,623,366	1,239,465	1,120,684	959,535
351205	HUXLEY COMM. COOP.	A	4,685,860	4,444,341	3,428,897	3,322,604	2,855,957
351206	IAMO TEL CO - IA	C	1,400,356	1,415,271	1,199,168	1,037,011	842,153
351209	INTERSTATE 35 TEL CO	C	39,797,194	241,755,774	159,737,408	3,009,200	2,721,566
351212	JEFFERSON TEL CO -IA	A	6,544,355	6,121,298	5,318,123	5,107,991	4,255,789
351213	JORDAN SOLDIERVALLEY	A	3,598,747	3,500,352	2,954,869	3,033,498	2,589,988
351214	KALONA COOP TEL CO	C	3,346,881	4,749,168	4,526,286	4,360,726	3,861,805
351217	KEYSTONE FRMS COOP	A	1,620,300	1,552,051	1,244,405	1,234,898	1,085,926
351220	LA PORTE CITY TEL CO	A	3,321,244	3,251,260	2,744,937	2,370,804	1,754,380
351222	LA MOTTE TEL CO	A	1,488,268	1,571,762	1,735,498	1,266,152	872,776
351225	LEHIGH VALLEY COOP	A	3,338,155	3,143,261	2,650,895	2,487,238	2,032,387
351228	LONE ROCK CO-OP TEL	A	590,187	457,769	381,936	348,506	325,849
351229	LOST NATION-ELWOOD	C	3,850,462	3,477,677	2,977,664	2,966,679	1,906,076
351230	NORTHEAST IOWA TEL	A	4,954,104	4,706,344	4,907,422	3,892,350	3,025,613
351232	LYNNVILLE TEL. CO.	A	39,965,061	6,368,456	2,507,896	8,501,190	9,403,564
351235	FARMERS (MANILLA)	A	1,547,495	1,345,843	1,281,018	1,184,422	1,087,372
351237	MARNE & ELK HORN TEL	A	3,708,452	3,621,343	3,265,823	3,280,737	2,595,105
351238	MARTELLE COOP ASSN	A	529,946	514,197	426,492	410,613	338,902
351239	MASSENA TEL CO	A	1,685,959	1,493,514	1,223,896	1,188,812	999,801
351241	MECHANICSVILLE TEL	A	1,675,850	1,401,606	1,106,043	1,079,869	947,062
351242	MILES COOP TEL ASSN	A	1,574,954	1,490,850	1,163,110	1,022,065	786,805
351245	MINBURN TEL CO	A	1,114,182	825,538	644,730	574,843	456,010
351246	MINERVA VALLEY TEL	A	2,017,555	1,791,058	1,154,153	1,160,447	920,499
351247	MODERN COOP TEL CO	A	1,635,443	1,576,964	1,244,990	1,083,901	866,851
351248	MONTEZUMA MUTUAL TEL	A	3,855,569	3,722,145	3,304,099	3,118,674	2,825,572
351250	MUTUAL TEL CO	A	1,415,658	1,251,315	980,077	847,430	725,092
351251	MEDIAPOLIS TEL CO	A	4,588,678	5,192,697	4,937,992	4,412,279	3,317,486
351252	MUTUAL TEL CO	C	17,245,669	16,365,332	15,186,158	13,793,032	12,191,130
351257	NORTH ENGLISH COOP	A	1,466,672	1,293,659	1,092,860	988,256	860,543
351259	NORTHERN IOWA TEL CO	A	5,739,552	5,490,508	4,828,624	4,323,122	3,779,316
351260	NORTHWEST IOWA TEL	A	24,669,424	12,324,255	20,436,740	50,859,157	48,964,721
351261	NORTHWEST TEL COOP	A	2,605,142	2,548,221	2,341,489	2,169,303	1,816,573
351262	COMM 1 NETWORK	C	3,371,784	3,147,095	3,075,544	2,750,408	2,120,606
351263	OGDEN TEL CO - IA	A	3,712,206	3,403,577	3,801,780	4,826,965	3,000,464
351264	OLIN TEL CO, INC	A	1,452,088	1,359,824	1,207,969	976,453	742,618
351265	ONSLow COOP TEL ASSN	A	527,185	409,003	380,129	338,054	317,759
351266	ORAN MUTUAL TEL CO	A	505,246	451,748	321,548	304,509	235,143
351269	PALO COOP TEL ASSN	A	1,796,168	1,736,781	1,869,296	1,456,911	1,195,530
351270	PALMER MUTUAL TEL CO	A	802,327	716,158	585,172	502,048	408,689
351271	PANORA COMM COOP	A	4,937,974	5,494,102	4,063,481	3,879,512	3,734,624
351273	PEOPLES TEL CO - IA	A	2,286,817	2,128,864	1,874,895	1,749,824	1,488,977
351274	CENTURYTEL-POSTVILLE	A	16,988,061	21,355,485	23,931,643	15,582,191	6,931,015
351275	PRAIRIEBURG TEL CO	A	545,467	419,290	292,112	323,106	262,160
351276	PRESTON TEL CO	A	1,563,376	1,353,295	1,190,398	1,247,361	1,152,304
351277	RADCLIFFE TEL CO	A	1,055,390	901,284	722,786	740,346	694,475
351278	READLYN TEL CO	A	9,876,694	23,095,979	26,135,453	31,053,285	28,089,940
351280	RINGSTED TEL CO	A	924,447	880,331	703,364	742,658	562,947
351282	ROCKWELL COOP ASSN	A	2,667,533	2,101,249	1,745,924	1,652,568	1,394,010
351283	ROYAL TEL CO	A	3,020,140	2,967,077	2,531,023	2,883,948	1,802,192
351284	RUTHVEN TEL EXCHANGE	A	1,739,481	1,683,297	1,415,697	1,275,638	1,227,221
351285	SAC COUNTY MUTUAL	A	2,417,343	2,412,378	1,980,999	1,818,219	1,582,929

Table 8.3
Total ILEC Interstate Access Minutes by Study Area

Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
351291	SCHALLER TEL CO	A	7,851,770	6,662,482	5,694,869	7,331,207	7,682,347
351292	SEARSBORO TEL CO	A	11,181,758	54,264,200	32,698,225	14,994,817	7,490,432
351293	SHARON TEL CO	A	2,645,613	2,438,641	2,206,069	2,015,558	1,668,823
351294	SCRANTON TEL CO	A	1,521,664	1,514,159	1,335,237	1,150,279	1,033,229
351295	SHELL ROCK COMM	C	2,083,946	1,753,992	1,650,873	1,483,591	1,162,695
351297	HEART OF IOWA COMM.	C	54,652,452	56,523,696	12,159,004	8,112,043	6,965,941
351298	SOUTH SLOPE COOP TEL	A	30,242,002	29,826,986	30,450,418	29,510,239	24,299,143
351301	SOUTHWEST TEL EXCH	A	45,894,115	2,206,022	1,918,406	1,528,203	1,252,123
351302	SPRINGVILLE COOP TEL	A	2,111,384	1,972,240	1,684,647	1,631,239	1,387,934
351303	COOP TEL EXCHANGE	C	1,252,311	1,189,837	905,284	857,700	785,896
351304	SWISHER TEL CO	A	2,042,301	1,932,446	1,623,769	1,513,988	1,229,195
351305	STRATFORD MUTUAL TEL	C	1,451,618	1,467,982	1,213,217	575,806	408,617
351306	SULLY TEL ASSOC	A	50,479,374	9,232,003	86,138,917	48,701,515	38,418,639
351307	SUPERIOR TEL COOP	A	525,037	58,321,503	95,675,523	592,017	393,048
351308	TEMPLETON TEL CO	A	1,049,419	822,296	1,133,603	585,768	475,440
351309	TERRIL TEL. COOP.	A	3,385,695	2,912,429	2,812,171	2,106,560	2,273,746
351310	TITONKA TEL CO	A	1,391,306	1,168,691	944,260	846,140	750,887
351316	UNITED FARMERS TEL	C	1,324,368	1,209,189	983,223	806,942	676,832
351319	VAN BUREN TEL CO	A	5,666,254	6,162,447	5,019,215	4,829,218	3,993,540
351320	VAN HORNE COOP TEL	A	2,033,158	1,906,099	1,825,713	3,270,121	1,690,663
351322	VENTURA TEL CO, INC	A	847,325	837,385	707,736	697,769	546,458
351324	VILLISCA FARMERS TEL	A	3,150,145	2,884,692	2,442,766	2,040,244	1,710,561
351326	WALNUT TEL CO, INC	A	2,115,140	2,113,846	1,962,407	1,862,350	1,563,890
351327	WEBB-DICKENS TEL	C	887,419	879,722	799,196	795,486	625,427
351328	WEBSTER-CALHOUN COOP	C	8,219,007	7,890,393	6,972,338	6,757,996	5,960,162
351329	WELLMAN COOP TEL	A	2,397,710	2,357,030	2,034,118	1,874,432	1,607,688
351331	WEST IOWA TEL CO	A	9,883,333	8,988,629	8,706,656	8,270,411	6,645,998
351332	WEST LIBERTY TEL CO	C	12,802,276	12,577,104	12,598,672	11,297,869	6,915,821
351334	WESTERN IOWA ASSN	A	8,964,719	8,341,128	7,001,851	6,607,898	5,471,366
351335	WESTSIDE INDEPENDENT	A	857,574	720,602	607,002	470,773	396,806
351336	WILTON TEL CO	A	3,529,234	2,949,415	3,267,897	2,774,072	2,209,519
351337	WINNEBAGO COOP-IA	C	16,414,163	14,988,788	15,218,148	14,213,161	12,088,586
351342	WOOLSTOCK MUTUAL	A	296,102	302,705	276,367	295,223	219,504
351343	WYOMING MUTUAL TEL	A	1,815,927	1,594,963	1,710,835	4,672,307	2,109,259
351344	PRAIRIE TEL CO	A	2,568,208	2,784,440	2,294,156	2,174,319	1,721,685
351346	ACE TEL ASSN-IA	C	12,606,785	12,743,932	11,973,743	11,405,779	9,657,632
351405	HILLS TEL CO, INC-IA	A	9,252,960	9,559,931	8,436,575	7,957,412	6,860,822
351407	KILLDUFF TEL. CO.	A	2,749,077	1,733,417	2,198,567	2,141,651	3,183,747
351424	MABEL COOP TEL-IA	A	2,983,664	2,806,336	2,502,930	2,092,737	2,460,192
351888	GRAND RIVER MUT-IA	C	22,858,988	21,386,762	19,019,193	17,589,175	14,545,505
355141	QWEST CORP-IA	1	2,433,062,711	2,262,148,155	2,107,321,383	1,957,115,229	1,744,531,953
	KANSAS - TOTAL		3,796,504,448	3,592,392,389	3,263,719,977	2,815,818,199	2,430,168,267
411317	UNITED OF EASTERN KS	2	165,093,340	148,352,495	139,137,271	134,980,007	108,230,081
411746	BLUE VALLEY TELE-COM	C	20,469,501	22,074,364	17,342,070	17,372,529	13,054,487
411756	COLUMBUS TELEPHONE	2	5,693,668	3,780,225	6,247,535	4,558,398	4,302,208
411756	COLUMBUS TELEPHONE	C	N/A	N/A	N/A	N/A	2,276,407
411758	COUNCIL GROVE TEL CO	C	4,323,805	3,991,895	3,821,831	3,297,654	3,386,469
411761	CUNNINGHAM TEL CO	C	4,493,465	4,226,597	3,779,396	3,420,595	3,099,598
411764	ELKHART TEL CO INC	C	4,605,912	4,289,913	3,208,473	4,336,946	3,818,804
411777	GOLDEN BELT TEL ASSN	C	14,352,377	13,107,450	11,655,017	10,520,220	8,539,475
411778	GORHAM TEL CO	C	1,131,096	935,813	1,451,848	1,124,655	915,153
411780	HAVILAND TEL CO	C	12,410,913	10,274,012	8,364,991	7,109,933	6,156,352
411781	H & B COMMUNICATIONS	C	3,230,554	2,601,641	2,592,875	2,391,045	2,091,384
411782	HOME TEL CO	C	4,605,067	5,617,015	6,047,346	5,070,296	4,045,481
411785	J. B. N. TEL CO INC	C	9,283,344	7,804,442	6,422,446	5,171,185	4,243,878
411788	KANOKLA TEL ASSN-KS	C	6,319,282	6,126,538	5,702,941	5,029,703	4,363,122
411791	LA HARPE TEL CO INC	C	3,133,700	2,918,570	1,579,616	1,342,844	1,294,191
411801	MADISON TEL., LLC	C	2,108,715	1,775,987	1,551,059	1,357,550	1,053,730
411807	MOKAN DIAL INC-KS	C	10,734,399	9,664,909	8,734,510	8,342,834	7,346,109
411808	MOUNDRIDGE TEL CO	C	77,254,196	9,599,430	7,448,974	6,841,957	6,512,606

Table 8.3
Total ILEC Interstate Access Minutes by Study Area

Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
411809	MUTUAL TEL CO	C	1,151,278	1,124,402	1,111,821	917,356	821,399
411814	PEOPLES TELECOM LLC	C	4,713,949	5,859,467	5,708,214	5,159,980	4,472,147
411817	PIONEER TEL ASSN INC	C	49,536,980	42,872,966	42,432,053	39,250,633	33,912,871
411818	CRAW-KAN TEL COOP	C	52,246,449	48,711,194	45,379,622	38,004,670	32,847,585
411820	RAINBOW TELECOM	C	7,200,211	6,440,142	5,433,782	4,590,406	3,658,712
411826	RURAL TEL SERVICE CO	C	35,318,986	34,527,243	45,483,868	43,349,186	34,584,215
411827	S & T TEL COOP ASSN	C	6,892,278	7,056,259	6,607,507	6,055,011	5,578,584
411829	S & A TEL CO INC	C	5,153,197	6,050,103	3,204,306	1,317,948	1,112,344
411831	S. CENTRAL TEL - KS	C	35,099,646	73,177,432	65,297,731	9,653,739	3,869,381
411833	SOUTHERN KANSAS TEL	C	42,163,825	30,486,716	31,077,266	29,591,026	33,530,280
411835	SUNFLOWER TEL CO	C	12,794,406	13,196,746	11,834,448	10,508,002	9,319,816
411839	TRI-COUNTY TEL ASSN	C	9,032,404	9,200,246	8,753,858	7,972,174	7,525,891
411840	TWIN VALLEY TEL INC	C	7,879,497	10,552,057	15,842,537	14,318,898	12,275,743
411841	UNITED TEL ASSN	C	23,635,076	23,967,591	22,997,350	15,691,422	13,388,502
411842	UTC OF KANSAS	2	223,833,717	181,207,396	159,383,438	142,130,563	110,019,610
411845	WAMEGO TEL CO INC	C	17,851,895	13,337,923	11,402,070	11,348,861	8,674,266
411847	WHEAT STATE TEL, INC	C	12,266,660	52,325,745	34,706,129	4,275,897	4,115,181
411849	WILSON TEL CO INC	C	4,782,292	5,432,406	6,869,011	6,240,487	4,906,315
411852	ZENDA TEL COMPANY	C	652,620	668,930	717,036	420,403	193,006
411957	EMBARQ MO-KS	2	23,175,889	21,059,583	18,619,286	15,949,061	12,536,636
412030	TOTAH COMMUNICATIONS	C	4,889,127	4,303,868	4,052,136	3,009,789	2,830,005
415214	SOUTHWESTERN BELL-KS	1	2,866,990,732	2,743,692,678	2,481,718,309	2,183,794,336	1,905,266,243
	KENTUCKY - TOTAL		5,079,369,056	4,864,375,408	4,554,778,916	4,092,196,631	3,644,067,932
260396	BALLARD RURAL COOP	A	18,102,511	16,138,710	13,709,607	12,765,372	11,071,639
260398	BRANDENBURG TEL CO	A	87,186,995	79,024,184	73,204,334	81,893,709	79,867,391
260401	DUO COUNTY TEL COOP	C	33,794,998	34,730,194	32,732,838	32,454,578	29,198,986
260402	WINDSTREAM KY WEST	2	N/A	N/A	N/A	17,043,397	30,668,662
260402	WINDSTREAM KY WEST	C	53,677,961	49,527,005	45,264,112	19,439,836	N/A
260406	FOOTHILLS RURAL COOP	C	50,407,822	48,874,334	47,924,701	47,963,213	47,868,587
260408	GEARHEART-COALFIELDS	A	22,453,649	18,539,879	18,698,416	18,903,717	17,818,591
260411	LESLIE COUNTY TEL CO	C	20,088,113	20,681,519	21,358,446	24,880,644	24,257,612
260412	LEWISPORT TEL CO	A	3,333,427	3,294,117	2,823,613	2,789,639	2,480,866
260413	LOGAN TEL. COOP. INC	C	20,186,633	18,436,185	16,856,842	16,355,891	15,181,193
260414	MOUNTAIN RURAL COOP	A	45,465,439	42,932,164	44,869,854	41,656,181	39,896,584
260415	PEOPLES RURAL COOP	C	18,485,169	18,123,003	17,651,596	17,537,654	15,533,067
260417	SALEM TEL CO	A	4,203,132	4,783,786	4,442,174	4,475,343	3,936,984
260418	SOUTH CENTRAL RURAL	C	79,602,992	75,713,949	69,976,813	74,092,744	67,987,040
260419	THACKER/GRIGSBY TEL	A	22,633,980	21,440,970	19,935,124	19,269,075	17,997,979
260421	WEST KENTUCKY RURAL	C	52,552,852	51,438,198	45,095,376	43,868,375	38,014,285
265061	CINCINNATI BELL-KY	1	424,063,593	404,512,932	382,250,478	323,024,148	253,874,641
265182	SO CENTRAL BELL-KY	1	2,687,098,535	2,621,198,090	2,451,358,418	2,155,944,818	1,863,442,946
269690	WINDSTREAM LEXINGTON	1	1,158,281,994	1,075,810,131	1,000,670,024	895,119,697	855,069,651
269691	WINDSTREAM LONDON	1	277,749,261	259,176,058	245,956,150	242,718,600	229,901,228
	LOUISIANA - TOTAL		5,339,655,517	5,311,300,827	4,653,580,758	4,249,604,711	3,673,791,109
270423	CENTURYTEL-CENTR LA	2	N/A	N/A	N/A	N/A	16,677,740
270423	CENTURYTEL-CENTR LA	C	52,113,890	53,961,255	41,918,564	37,115,583	16,829,186
270424	CENTURYTEL-SE LA	2	N/A	N/A	N/A	N/A	6,906,748
270424	CENTURYTEL-SE LA	C	26,063,560	22,012,617	18,938,579	16,950,454	7,525,684
270425	CAMERON TEL CO - LA	C	19,135,020	13,292,310	12,817,557	12,688,079	10,626,240
270426	CAMPTI-PLEASANT HILL	C	7,507,192	7,473,781	7,517,516	6,543,658	5,453,043
270427	CENTURYTEL-CHATHAM	2	N/A	N/A	N/A	N/A	1,793,480
270427	CENTURYTEL-CHATHAM	C	5,250,957	4,991,913	4,385,253	3,932,384	1,788,501
270428	DELCAMBRE TEL CO	A	2,432,958	2,143,925	1,596,144	1,374,053	1,170,489
270429	EAST ASCENSION TEL	C	111,810,439	86,931,499	77,431,625	67,147,058	62,649,385
270430	ELIZABETH TEL CO	C	8,795,255	7,818,558	6,598,577	5,988,453	5,105,491
270431	CENTURYTEL-NW LA	2	N/A	N/A	N/A	N/A	10,597,790
270431	CENTURYTEL-NW LA	C	36,531,775	33,265,573	27,740,661	24,807,062	10,936,243
270432	KAPLAN TEL CO	C	7,296,503	6,246,924	6,712,924	7,326,362	7,723,708
270433	LAFOURCHE TEL CO	C	30,444,146	32,918,675	28,346,764	30,084,921	27,909,069
270434	CENTURYTEL-EVANGELIN	2	N/A	N/A	N/A	N/A	24,506,628

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Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
270434	CENTURYTEL-EVANGELIN	C	84,466,736	74,093,036	62,747,534	56,985,538	25,256,809
270435	NORTHEAST LOUISIANA	C	2,987,046	3,094,929	3,581,503	3,084,634	2,554,770
270436	CENTURY NORTH LA	2	N/A	N/A	N/A	N/A	7,945,010
270436	CENTURY NORTH LA	C	25,688,371	23,338,674	19,793,040	18,177,359	8,150,378
270438	RESERVE TEL CO	C	13,866,270	14,192,508	12,363,667	11,839,469	10,706,255
270439	CENTURYTEL-RINGGOLD	2	N/A	N/A	N/A	N/A	2,293,333
270439	CENTURYTEL-RINGGOLD	C	6,208,650	5,798,496	5,147,964	5,176,599	2,292,696
270440	CENTURYTEL - EAST LA	2	N/A	N/A	N/A	N/A	2,528,181
270440	CENTURYTEL - EAST LA	C	9,354,024	8,477,810	6,856,452	6,257,585	2,641,199
270441	STAR TEL CO	C	9,814,530	7,224,988	7,006,637	6,730,077	5,432,429
270442	CENTURYTEL-SW LA	2	N/A	N/A	N/A	N/A	5,648,016
270442	CENTURYTEL-SW LA	C	18,596,775	15,720,275	12,842,946	11,883,605	5,418,160
275183	SO CENTRAL BELL-LA	1	4,861,291,420	4,888,303,081	4,289,236,851	3,915,511,778	3,374,724,448
	MAINE - TOTAL		1,989,724,414	1,866,327,183	1,573,309,676	1,393,822,515	1,335,385,600
100002	OXFORD WEST TEL CO	C	18,450,348	16,247,005	14,656,882	13,264,324	12,067,436
100003	LINCOLNVILLE NETWORKS	C	49,194,272	38,465,474	35,285,728	32,183,564	28,447,277
100004	CHINA TEL CO.	C	10,664,475	9,045,390	6,881,630	5,932,400	4,840,281
100005	COBBOSSEECONTEE TEL	A	2,388,989	2,064,696	1,687,416	1,488,014	1,267,413
100007	ISLAND TEL CO	C	1,366,241	1,521,732	1,252,246	1,183,216	1,015,250
100010	HAMPDEN TEL CO	C	9,330,639	10,128,420	8,402,122	7,970,154	6,399,845
100011	HARTLAND & ST ALBANS	C	9,333,004	10,990,929	9,260,290	9,552,936	8,727,681
100015	COMMUNITY SERVICE	A	28,052,736	27,005,276	22,714,083	20,679,614	17,322,371
100019	OXFORD COUNTY TEL	A	17,042,827	14,503,737	14,615,574	13,660,162	12,440,854
100020	PINE TREE TEL & TEL	A	15,268,040	14,069,753	12,779,139	13,097,078	11,076,333
100022	SACO RIVER TEL & TEL	A	24,998,567	24,506,020	21,644,209	19,921,634	15,572,122
100024	SOMERSET TEL CO	C	26,136,904	27,867,559	24,399,341	22,654,287	20,457,071
100025	STANDISH TEL CO	C	58,039,175	51,105,406	43,063,123	39,027,250	31,632,105
100027	UNION RIVER TEL CO	C	3,714,213	3,613,362	3,005,329	2,943,541	2,720,610
100029	UNITEL, INC.	C	15,103,150	13,336,242	11,974,521	11,507,099	10,616,632
100031	WARREN TEL CO	C	5,846,461	5,164,192	4,645,504	4,086,451	3,086,895
100034	WEST PENOBSCOT TEL	C	6,705,576	7,188,100	6,371,693	5,735,738	5,091,187
103313	NORTHLAND TEL CO-ME	C	80,648,634	74,911,807	64,080,336	59,986,561	51,763,444
103315	MID MAINE TELECOM	C	17,250,091	14,754,704	12,455,274	10,593,228	8,864,070
105111	NET dba FAIRPOINT-ME	1	1,590,190,072	1,499,837,379	1,254,135,236	1,098,355,264	1,081,976,723
	MARYLAND - TOTAL		9,744,455,130	9,371,185,239	8,615,387,228	7,729,202,173	7,043,313,791
180216	ARMSTRONG TEL OF MD	C	23,775,489	22,285,682	20,591,098	18,935,406	17,778,548
185030	VERIZON MARYLAND INC	1	9,720,679,641	9,348,899,557	8,594,796,130	7,710,266,767	7,025,535,243
	MASSACHUSETTS - TOTAL		8,884,620,031	8,737,364,454	7,355,717,838	6,513,903,806	5,726,187,973
110036	GRANBY TEL & TEL -MA	C	5,995,710	5,658,812	4,780,893	4,094,652	3,940,419
110037	RICHMOND TEL CO	C	3,022,713	2,660,894	2,545,245	2,369,899	2,332,906
115112	VERIZON MASS.	1	8,875,601,608	8,729,044,748	7,348,391,700	6,507,439,255	5,719,914,648
	MICHIGAN - TOTAL		10,189,333,090	9,752,218,651	8,854,840,844	7,930,335,883	6,722,160,058
310542	ALLBAND COMM COOP	C	N/A	1,077	39,144	156,863	266,714
310669	ALLENDAL TEL CO	A	7,674,531	6,793,382	8,530,512	8,242,870	7,299,015
310671	CENTURYTEL MW-MI	2	N/A	N/A	N/A	N/A	17,729,597
310671	CENTURYTEL MW-MI	C	72,085,844	54,843,383	47,869,205	41,996,062	19,030,026
310672	COMM CORP OF MI	C	8,968,425	9,080,417	8,224,382	7,769,094	7,131,740
310675	BARAGA TEL CO	A	13,674,343	12,599,509	11,252,008	11,379,515	10,403,860
310676	BARRY COUNTY TEL CO	A	12,706,980	12,961,136	12,895,866	13,110,323	11,778,560
310677	ISLAND TEL CO	C	2,059,014	2,085,333	1,529,649	1,720,006	1,573,181
310678	BLANCHARD TEL. CO.	A	4,773,062	4,642,058	3,849,835	3,562,478	3,427,991
310679	BLOOMINGDALE TEL CO	C	5,031,326	4,708,653	4,467,181	4,098,814	3,758,818
310682	FRONTIER-MICHIGAN	2	52,764,791	49,222,118	46,599,012	42,745,039	36,929,566
310683	CARR TEL CO	C	3,217,996	3,384,658	2,796,467	3,169,625	3,270,097
310685	CHATHAM TEL CO - MI	C	7,008,984	7,079,742	6,778,859	6,426,566	5,642,688
310688	CLIMAX TEL CO	A	2,961,589	2,949,247	2,532,413	2,215,421	3,458,801
310689	CENTURYTEL-UPPER MI	2	N/A	N/A	N/A	N/A	10,274,540
310689	CENTURYTEL-UPPER MI	C	21,454,781	21,557,418	23,987,425	22,204,512	9,917,533
310691	DEERFIELD FARMERS	C	7,707,514	6,427,006	5,981,015	5,383,569	4,961,390
310692	DRENTHE TEL CO	A	1,124,020	920,832	790,971	780,939	688,835

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Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
310694	FARMERS DBA CHAPIN	A	2,037,107	2,087,765	2,086,486	1,844,414	1,535,194
310695	VERIZON NORTH-MI	1	1,547,214,885	1,408,882,232	1,216,558,471	1,025,207,720	817,127,302
310702	CENTURYTEL MICHIGAN	2	N/A	N/A	N/A	N/A	39,736,479
310702	CENTURYTEL MICHIGAN	C	130,768,183	116,445,785	96,867,458	90,065,615	40,645,160
310703	KALEVA TEL CO	A	6,279,724	6,164,290	5,300,718	4,196,819	3,927,690
310704	ACE TEL OF MICHIGAN	C	10,253,832	10,721,646	10,366,381	8,745,730	9,081,113
310705	CENTURY-NORTHN MICH.	2	N/A	N/A	N/A	N/A	2,086,682
310705	CENTURY-NORTHN MICH.	C	6,690,170	5,707,268	4,782,378	4,590,602	2,278,886
310708	LENNON TEL CO	C	4,810,504	4,517,685	4,278,873	3,136,214	2,301,168
310711	MIDWAY TEL CO	C	2,779,110	2,674,205	2,885,297	2,741,066	2,652,818
310713	HIAWATHA TEL CO	C	18,219,330	16,658,752	17,586,698	15,018,536	13,608,701
310714	OGDEN TEL CO	C	1,300,226	1,355,103	1,239,679	1,168,370	848,465
310717	ONTONAGON COUNTY TEL	C	12,384,175	12,233,361	13,772,635	12,660,185	11,323,164
310720	PENINSULA TEL CO -MI	C	3,734,906	3,345,486	2,924,342	2,422,215	2,394,994
310721	PIGEON TEL CO	C	7,837,604	7,367,598	6,293,130	5,743,880	5,391,219
310725	SAND CREEK TEL CO	A	3,595,135	2,882,432	2,725,546	2,603,215	2,225,307
310726	SHIAWASSEE TEL CO	C	9,401,094	9,430,549	9,140,674	9,368,655	8,720,976
310728	SPRINGPORT TEL CO	C	5,647,741	5,662,451	5,660,019	4,867,751	3,285,467
310732	UPPER PENINSULA TEL	C	20,530,228	19,604,297	16,845,591	16,100,885	14,054,280
310734	WALDRON TEL CO	C	2,010,231	1,963,336	1,791,813	1,531,037	1,155,829
310735	WESTPHALIA TEL CO	A	2,690,966	2,857,254	2,216,149	2,383,344	1,545,327
310737	WINN TEL CO	C	2,218,423	2,116,805	1,916,487	2,311,538	1,457,929
310738	WOLVERINE TEL CO	C	17,010,070	17,493,716	16,028,286	17,115,100	15,377,165
313033	VERIZON N-MI(ALLTEL)	1	132,387,678	118,746,974	104,684,705	88,292,415	70,316,685
315090	MICHIGAN BELL TEL CO	1	8,016,318,568	7,774,043,692	7,120,765,084	6,433,258,881	5,491,539,106
	MINNESOTA - TOTAL		6,120,348,647	5,671,650,785	5,038,625,736	4,623,973,402	4,018,283,090
361123	CITIZENS-FRONTIER-MN	2	310,464,233	279,890,562	240,030,352	232,936,340	205,173,625
361337	WINNEBAGO COOP-MN	C	1,757,295	1,782,044	1,498,351	1,357,100	1,277,335
361346	ACE TEL ASSN-MN	C	34,059,641	32,352,711	29,080,235	26,199,995	23,116,048
361347	ALBANY MUTUAL ASSN	A	6,315,166	5,518,522	4,293,536	4,587,455	3,257,651
361348	WILDERNESS VALLEY	A	74,591	70,426	61,575	49,471	56,342
361350	ARVIG TEL CO	C	22,559,146	22,547,869	18,533,508	21,039,978	21,792,903
361353	CITY OF BARNESVILLE	A	3,175,914	3,164,284	2,863,435	2,695,440	2,323,348
361356	BENTON COOP TEL CO	A	8,545,135	7,820,554	6,670,439	5,816,250	5,547,002
361358	BLUE EARTH VALLEY	C	17,824,564	14,184,609	12,320,164	11,456,510	9,855,267
361362	BRIDGEWATER TEL CO	C	39,394,829	45,990,038	20,744,122	17,375,202	14,612,198
361365	CALLAWAY TEL CO	A	963,329	969,174	809,681	720,422	548,508
361367	FRONTIER-MINNESOTA	2	315,852,571	295,487,059	267,501,006	224,949,053	195,422,418
361370	CLARA CITY TEL EXCH	C	2,719,753	2,496,266	2,027,766	1,797,342	1,663,859
361372	CLEMENTS TEL CO	A	393,323	308,862	596,666	586,707	449,053
361373	CONSOLIDATED TEL CO	A	16,185,315	15,069,887	12,487,387	12,470,466	9,314,165
361374	ARROWHEAD COMM CORP	C	1,496,079	1,354,119	999,060	869,821	771,600
361375	MID-COMM-HICKORYTECH	A	59,010,548	57,850,573	54,003,163	58,155,202	51,982,829
361380	DELAVAN TEL CO	A	714,457	610,378	573,313	459,317	337,753
361381	DUNNELL TEL CO	A	894,073	946,589	805,832	763,245	615,145
361383	EAGLE VALLEY TEL CO	C	1,443,341	1,248,896	1,150,154	990,009	814,764
361384	EASTON TEL CO	C	1,622,070	1,278,183	1,126,770	1,206,485	1,069,334
361385	EAST OTTER TAIL TEL	C	45,105,010	43,204,490	36,120,128	33,353,982	27,643,091
361386	ECKLES TEL CO	C	7,394,363	10,169,036	7,609,696	6,297,974	5,580,025
361387	EMILY COOP TEL CO	C	2,604,473	2,616,244	1,902,040	1,717,635	1,396,871
361389	FARMERS MUTUAL TEL	A	3,184,174	3,042,903	2,750,973	2,528,019	2,318,524
361390	FEDERATED TEL COOP	A	5,394,983	4,937,647	4,869,054	4,133,623	3,586,417
361391	FELTON TEL CO. INC.	C	1,778,598	1,605,296	1,505,823	1,460,649	1,047,733
361395	GARDEN VALLEY TEL CO	C	37,142,603	38,255,079	30,683,654	27,057,887	24,636,968
361396	GARDONVILLE COOP TEL	A	5,078,554	4,873,707	4,401,289	4,166,809	3,408,592
361399	GRANADA TEL CO	C	519,855	444,283	351,423	259,085	204,757
361401	HALSTAD TEL CO	A	4,649,028	4,179,012	3,836,233	3,738,533	3,209,427
361403	FEDERATED TEL COOP	A	2,296,668	2,380,824	2,379,724	2,681,282	2,395,444
361404	HARMONY TEL CO	A	2,637,832	2,526,132	2,073,435	1,955,578	1,843,568
361405	HILLS TEL CO, INC	A	2,653,761	2,554,761	2,487,083	2,385,558	2,296,984

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361408	HOME TEL CO - MN	A	4,430,186	4,341,684	3,858,314	3,666,032	2,943,454
361409	HUTCHINSON TEL CO	A	23,068,129	21,207,149	17,440,498	15,248,607	11,253,120
361410	JOHNSON TEL CO	C	4,512,591	4,099,604	3,612,777	3,207,046	2,754,903
361412	KASSON & MANTORVILLE	C	8,709,804	8,312,044	7,525,178	7,448,339	5,755,550
361413	MID STATE DBA KMP	A	3,280,965	3,650,606	3,334,646	3,844,931	3,716,256
361414	LAKEDALE TEL CO	C	23,712,095	20,297,363	16,279,039	15,801,311	20,931,307
361419	LISMORE COOP TEL CO	C	674,186	601,785	543,756	502,027	485,339
361422	LONSDALE TEL CO	C	3,579,026	3,530,868	2,747,468	2,799,313	2,300,277
361423	RUNESTONE TEL ASSN	A	1,772,575	1,658,927	1,344,190	1,289,334	1,048,268
361424	MABEL COOP TEL - MN	A	2,095,216	1,772,025	1,530,269	1,470,777	1,352,677
361425	CHRISTENSEN COMM CO	C	4,139,062	3,886,139	2,986,614	2,791,670	2,188,926
361426	MANCHESTER-HARTLAND	A	1,162,530	1,160,274	1,023,596	900,819	774,637
361427	MANKATO-HICKORYTECH	A	75,362,392	68,884,219	65,627,545	61,240,733	56,690,652
361430	MELROSE TEL CO	A	18,098,449	16,744,774	15,466,158	13,666,151	12,397,505
361431	MIDWEST TEL CO	A	6,019,042	5,804,462	4,744,572	4,414,669	3,663,084
361433	MID STATE TEL CO	C	12,387,020	13,861,730	12,246,968	14,217,560	12,433,816
361439	MINNESOTA VALLEY TEL	A	1,714,482	1,274,749	1,210,035	1,178,217	981,230
361440	CANNON VLY TELECOM	A	4,304,544	4,075,804	3,922,383	3,602,101	3,279,311
361442	NEW ULM TELECOM, INC	C	22,283,832	19,810,240	16,960,391	18,316,042	15,529,992
361443	LORETEL SYSTEMS, INC	A	31,782,395	28,532,605	24,870,830	22,514,184	19,404,630
361445	CENTURYTEL-MINNESOTA	2	N/A	N/A	N/A	N/A	21,986,868
361445	CENTURYTEL-MINNESOTA	C	72,426,771	64,774,965	55,653,887	52,234,867	23,531,139
361448	OSAKIS TEL CO	A	4,317,531	3,927,721	3,098,951	2,965,744	2,461,738
361450	PARK REGION MUTUAL	A	12,324,343	12,174,969	10,088,111	11,102,022	7,777,664
361451	PAUL BUNYAN RURAL	C	29,890,854	27,515,579	24,320,015	23,826,358	21,521,303
361453	PEOPLES TEL CO - MN	C	4,949,468	4,769,620	4,015,418	4,131,168	3,312,215
361454	PINE ISLAND TEL CO	C	6,868,032	6,328,143	5,754,687	5,489,700	4,703,425
361456	EMBARQ MINNESOTA	2	426,764,619	386,935,059	356,486,979	320,739,087	254,073,165
361472	REDWOOD COUNTY TEL	A	12,374,411	10,582,224	14,765,989	12,323,380	10,449,044
361474	ROTHSAY TEL CO, INC	A	1,243,044	1,051,162	854,995	724,968	638,220
361475	RUNESTONE TEL ASSN	A	8,084,308	7,610,221	7,089,719	6,350,795	5,362,013
361476	SACRED HEART TEL CO	A	1,014,770	857,809	668,232	575,505	583,452
361479	SCOTT RICE -INTEGRA	A	44,574,271	42,464,246	36,622,699	33,554,578	30,102,222
361482	LAKEDALE CONNECTIONS	C	28,182,337	27,394,959	31,128,831	26,025,836	23,993,426
361483	SLEEPY EYE TEL CO	C	13,709,287	12,401,218	10,048,786	8,910,923	7,292,706
361485	SPRING GROVE COMM.	A	3,378,493	2,945,707	3,107,599	2,942,662	2,488,391
361487	STARBUCK TEL CO	A	3,132,231	2,983,649	2,364,327	2,073,607	2,181,365
361491	TWIN VALLEY-ULEN TEL	C	10,001,069	10,054,578	8,438,149	7,490,373	6,352,716
361494	UPSALA COOP TEL ASSN	A	2,142,726	1,981,776	1,546,438	1,546,046	1,031,437
361495	VALLEY TEL CO - MN	A	5,481,975	5,889,960	3,757,600	5,607,082	2,856,996
361499	CROSSLAKE TEL CO	A	4,149,234	3,905,639	3,670,917	3,189,309	2,615,944
361500	NORTHERN TEL CO - MN	A	117,686	156,470	85,107	81,159	124,858
361501	WEST CENTRAL TEL	C	9,768,575	9,664,941	8,215,139	7,977,986	7,177,010
361502	WESTERN TEL CO	A	4,648,683	4,516,086	3,821,256	3,850,334	3,621,581
361505	WIKSTROM TEL CO, INC	A	14,474,403	14,539,132	13,423,687	11,887,882	10,446,000
361507	WINSTED TEL CO	A	2,898,856	3,507,123	2,875,054	2,809,568	2,354,370
361508	WINTHROP TEL CO	A	2,564,685	1,879,200	1,577,801	1,506,981	1,273,809
361510	WOODSTOCK TEL CO	C	2,416,735	1,988,558	1,954,733	2,014,656	1,994,317
361512	WOLVERTON TEL CO	A	443,928	403,352	324,476	334,633	305,479
361515	ZUMBROTA TEL CO	A	4,457,753	4,159,360	3,559,743	3,319,880	2,876,813
361654	INTERSTATE TELECOMM.	A	4,547,468	4,717,306	5,025,843	5,246,823	4,958,752
365142	QWEST CORP-MN	1	4,153,980,006	3,839,025,895	3,423,344,389	3,132,207,319	2,734,476,325
367123	CITIZENS-FRONTIER-MN	1	6,026,299	5,306,088	4,513,882	4,593,884	3,903,845
	MISSISSIPPI - TOTAL		4,023,908,923	3,786,007,343	3,499,544,471	3,229,710,759	2,844,100,316
280446	BAY SPRINGS TEL CO	C	36,001,373	29,551,148	25,616,075	23,123,675	19,330,064
280447	BRUCE TEL CO - MS	C	7,844,827	8,626,141	11,043,513	10,392,829	7,618,980
280448	CALHOUN CITY TEL CO	C	9,196,760	9,402,158	8,488,586	7,692,250	6,728,955
280451	DECATUR TEL CO -MS	A	4,401,279	3,720,340	2,975,602	2,812,796	2,406,936
280452	DELTA TEL CO	C	15,529,938	15,249,646	15,145,979	15,242,666	12,794,225
280453	WINDSTREAM MS	2	N/A	N/A	N/A	13,936,185	25,474,631

Table 8.3
Total ILEC Interstate Access Minutes by Study Area

Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
280453	WINDSTREAM MS	C	36,090,351	31,638,227	27,712,628	13,396,366	N/A
280454	FRANKLIN TEL CO - MS	C	27,568,554	26,656,956	23,837,179	23,027,474	17,157,412
280455	FULTON TEL CO	C	20,738,478	17,380,716	14,929,357	12,890,373	10,797,835
280456	GEORGETOWN TEL CO	C	1,508,248	1,286,985	1,352,163	1,132,907	918,248
280457	LAKESIDE TEL. CO.	C	1,255,851	1,120,762	935,953	777,556	740,998
280458	CENTURYTEL - N. MISS	2	N/A	N/A	N/A	N/A	29,629,577
280458	CENTURYTEL - N. MISS	C	86,578,536	83,568,677	78,726,095	71,639,475	31,360,285
280460	FRONTIER-MISSISSIPPI	A	15,471,512	12,938,929	12,346,179	12,011,772	11,142,702
280461	NOXAPATER TEL CO	C	3,355,426	2,813,239	2,254,180	1,874,307	1,676,572
280462	MOUND BAYOU TEL & CO	C	5,908,850	4,773,290	4,009,257	3,713,878	3,121,986
280466	SLEDGE TEL CO	C	2,521,720	2,204,041	1,910,107	1,541,668	1,262,426
280467	SMITHVILLE TEL CO	A	2,323,717	1,935,175	1,422,770	1,253,532	1,071,132
283301	SOUTHEAST MS TEL CO	C	16,128,240	14,340,657	12,259,365	11,227,956	9,562,368
285184	SO CENTRAL BELL-MS	1	3,729,447,617	3,516,914,588	3,252,779,865	3,000,555,862	2,650,117,388
287449	MYRTLE TEL CO	A	2,037,646	1,885,668	1,799,618	1,467,232	1,187,596
	MISSOURI - TOTAL		8,259,543,975	7,881,624,395	7,292,775,450	6,674,043,455	5,848,198,205
420463	BPS Tel. Co.	C	14,850,259	14,071,203	12,468,137	11,102,532	9,429,085
421151	SPECTRA COMM. GROUP	2	N/A	N/A	N/A	N/A	107,654,851
421151	SPECTRA COMM. GROUP	C	334,773,133	307,033,033	269,507,332	255,990,906	112,450,337
421206	IAMO TEL CO - MO	C	3,672,536	3,399,595	3,110,477	2,931,877	2,342,402
421472	FAIRPOINT MISSOURI	C	20,828,261	19,294,502	15,311,070	14,254,022	12,659,890
421759	CRAW-KAN TEL COOP-MO	A	9,615,102	9,363,378	8,951,277	7,947,803	7,088,904
421807	MOKAN DIAL INC-MO	C	2,505,221	2,588,287	2,909,662	2,961,887	2,556,928
421860	ALMA COMM. CO.	C	1,171,996	936,651	518,695	499,198	567,042
421864	CHARITON VALLEY TEL	C	21,175,771	21,011,041	19,312,474	16,014,549	11,304,670
421865	CITIZENS TEL CO - MO	C	7,557,426	6,554,034	5,655,884	5,299,309	4,724,991
421866	Ozark Tel. Co.	C	15,457,589	16,058,421	16,008,670	16,757,845	14,272,855
421874	ELLINGTON TEL CO	C	6,742,287	4,685,730	4,200,591	3,845,980	3,437,804
421876	FARBER TEL CO	A	557,297	377,112	302,733	278,801	258,878
421882	FIDELITY TEL CO	C	35,373,751	31,988,681	28,181,821	25,202,961	20,596,390
421885	WINDSTREAM MO	2	N/A	N/A	N/A	70,679,594	132,792,013
421885	WINDSTREAM MO	C	213,686,247	209,774,984	184,024,469	88,729,280	N/A
421886	GOODMAN TEL CO	C	8,443,121	7,888,584	8,026,697	7,760,145	6,612,836
421887	GRANBY TEL CO - MO	C	7,585,043	6,654,960	6,599,611	4,647,414	3,961,422
421888	GRAND RIVER MUT-MO	C	42,044,299	40,959,594	35,184,756	32,324,601	26,922,340
421890	GREEN HILLS TEL CORP	C	11,143,066	10,852,651	9,187,260	8,539,671	7,588,660
421893	CHOCTAW TELEPHONE CO	A	1,501,220	1,430,857	1,150,168	898,350	761,160
421900	KLM TEL CO	A	3,636,307	3,379,095	3,470,733	3,561,304	3,665,145
421901	KINGDOM TELEPHONE CO	C	14,900,194	11,463,209	9,160,485	8,738,447	9,517,074
421908	LE-RU TELEPHONE CO	C	8,623,712	9,147,783	8,808,159	7,285,734	7,536,323
421912	MCDONALD COUNTY TEL	C	17,721,262	16,670,803	15,223,859	13,432,167	11,851,958
421914	MARK TWAIN RURAL TEL	C	12,757,142	11,793,857	10,686,639	11,288,467	9,217,195
421917	MID-MISSOURI TEL CO	C	8,263,535	7,831,435	8,131,130	8,263,746	7,483,919
421920	MILLER TEL CO - MO	C	2,334,475	2,278,458	1,935,229	1,297,266	1,219,078
421927	NEW FLORENCE TEL CO	C	1,554,231	1,004,548	1,208,249	743,970	448,580
421928	NEW LONDON TEL CO	C	1,755,222	1,544,069	1,403,658	1,298,556	1,125,862
421929	HOLWAY TEL CO	C	1,621,667	1,706,528	1,398,859	1,022,735	874,018
421931	NE MISSOURI RURAL	C	20,490,914	19,259,086	18,089,848	16,966,450	14,555,244
421932	LATHROP TEL COMPANY	A	3,705,897	3,243,315	3,214,761	3,386,118	2,957,546
421934	ORCHARD FARM TEL CO	C	885,923	898,337	866,746	784,160	640,140
421935	OREGON FARMERS MUT	C	2,871,482	2,481,361	2,030,709	1,839,578	1,825,432
421936	PEACE VALLEY TEL CO	A	1,919,211	1,747,455	1,464,458	1,401,820	1,158,618
421942	ROCK PORT TEL CO	A	6,057,864	5,485,483	5,395,510	4,860,791	4,573,821
421945	SENECA TEL CO	C	13,302,697	11,259,663	11,054,370	11,048,684	10,020,351
421949	STEELVILLE TEL EXCH	C	11,148,520	10,916,629	9,145,314	9,782,662	8,604,699
421951	STOUTLAND TEL CO	C	9,495,096	20,320,049	3,739,475	3,636,896	3,505,316
421957	EMBARQ MISSOURI	2	638,289,725	570,370,225	516,893,052	466,141,801	384,578,587
425213	SOUTHWESTERN BELL-MO	1	5,736,975,169	5,523,600,516	5,177,738,608	4,711,574,287	4,179,854,525
429784	CENTURYTEL-MO CEN	1	244,829,594	230,375,033	207,031,592	194,450,899	169,804,947
429785	CENTURYTEL-MO BELLE	1	10,078,334	8,630,868	6,623,105	6,608,751	5,617,277

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Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
429786	CENTURYTEL-MO SOUTH	1	75,950,711	70,847,668	65,972,320	67,029,064	57,681,491
429787	CENTURYTEL-MO SW	1	651,691,466	620,445,624	571,476,798	540,932,377	461,897,601
	MONTANA - TOTAL		1,731,697,698	1,498,800,654	1,361,538,764	1,244,348,002	1,080,946,957
482235	BLACKFOOT TEL - BTC	C	31,086,680	28,286,284	25,968,234	24,618,917	22,687,216
482241	HOT SPRINGS TEL CO	C	3,160,693	3,111,087	3,206,171	3,155,123	3,048,869
482242	INTERBEL TEL COOP	C	11,324,663	11,353,477	10,443,715	10,328,643	9,710,493
482244	LINCOLN TEL CO INC	C	5,026,667	4,890,337	4,620,803	3,558,771	3,762,847
482246	MID-RIVERS TEL COOP	C	43,601,482	42,960,597	40,458,068	41,167,224	37,470,015
482247	NEMONT TEL COOP-MT	C	43,567,969	39,841,324	40,929,575	40,160,559	37,533,262
482248	NORTHERN TEL COOP	C	5,806,903	5,561,931	5,753,800	5,514,731	4,807,639
482249	CENTURYTEL-MONTANA	2	N/A	N/A	N/A	N/A	73,064,776
482249	CENTURYTEL-MONTANA	C	233,764,641	216,763,973	189,575,551	166,190,564	74,462,734
482250	PROJECT TEL CO	C	20,698,125	19,925,695	17,425,267	16,278,963	14,368,545
482251	RANGE TEL COOP-MT	C	20,590,040	17,568,077	16,849,886	16,051,236	15,189,137
482252	RONAN TEL CO	A	11,245,288	10,314,296	9,554,486	8,914,643	7,699,208
482254	SOUTHERN MONTANA TEL	C	3,890,829	3,809,763	3,596,289	3,627,959	3,368,962
482255	3-RIVERS TEL COOP	C	70,032,819	67,242,673	61,035,694	55,100,769	48,319,089
482257	TRIANGLE TEL COOP	C	35,693,202	35,411,412	35,909,493	32,226,075	28,872,082
483308	BLACKFOOT TEL - CFT	C	43,142,129	40,498,272	38,365,769	36,620,271	32,996,247
483310	CENTRAL MONTANA	C	25,275,843	23,636,740	23,424,067	21,995,903	19,331,949
484322	CITIZENS-FRONTIER-MT	2	34,881,253	33,123,568	31,304,563	32,058,349	29,169,436
485104	QWEST CORP-MT	1	1,088,908,472	894,501,148	803,117,333	726,779,302	615,084,451
	NEBRASKA - TOTAL		2,192,324,558	2,106,722,364	1,928,670,141	1,795,825,394	1,613,887,796
371128	CITIZENS-FRONTIER-NE	2	114,374,411	107,171,803	99,015,460	97,027,534	79,182,341
371516	ARAPAHOE TEL CO	C	6,811,550	6,484,775	6,036,809	5,597,186	4,901,122
371517	ARLINGTON TEL CO	C	2,334,236	2,132,413	1,874,444	1,704,870	1,444,548
371518	ELSIE COMM., INC.	C	725,849	648,405	560,173	549,433	380,038
371524	THE BLAIR TEL CO	C	24,153,892	21,358,517	20,694,972	21,667,835	18,356,425
371525	THREE RIVER TELCO	C	4,071,167	4,276,019	3,966,321	3,701,589	3,359,680
371526	CAMBRIDGE TEL CO -NE	C	4,102,595	3,832,533	3,466,361	2,713,270	2,039,896
371530	CONSOLIDATED TELCO	A	5,476,136	5,641,938	5,130,494	4,160,530	3,342,119
371531	CLARKS TELECOM CO.	C	2,108,245	1,913,681	1,461,054	1,267,904	1,142,075
371532	CONSOLIDATED TEL CO	C	8,435,447	8,990,691	8,078,083	7,324,801	5,847,963
371534	COZAD TEL CO	C	6,167,858	5,559,935	4,736,299	4,168,347	3,662,997
371536	CURTIS TEL CO	C	2,537,104	2,481,036	2,229,233	1,788,911	1,475,839
371537	DALTON TEL CO, INC	C	13,383,345	16,758,620	14,050,624	3,564,420	2,889,495
371540	DILLER TEL CO	C	2,345,699	2,197,819	2,023,215	1,834,418	1,626,323
371542	EASTERN NEBRASKA TEL	C	9,814,175	11,691,456	11,203,921	10,211,860	9,526,917
371553	GLENWOOD TEL MEMBER	C	10,551,476	57,749,150	44,474,009	3,658,669	3,330,716
371555	HAMILTON TEL CO	A	21,490,197	27,437,799	23,078,380	16,880,937	13,800,748
371556	HARTINGTON TEL CO	C	10,843,437	10,784,859	4,426,190	3,343,356	2,938,426
371557	HARTMAN TEL EXCH INC	C	1,928,148	1,998,822	1,846,024	1,612,596	1,381,787
371558	HEMINGFORD COOP TEL	C	2,715,876	2,790,129	2,554,484	2,209,502	1,983,130
371559	HENDERSON CO-OP TEL	C	2,523,287	2,265,228	2,011,216	1,782,185	1,525,057
371561	HERSHEY COOP TEL CO	C	2,037,847	1,803,344	1,543,665	1,366,850	1,252,215
371562	CONSOLIDATED TELECOM	A	3,325,778	3,123,989	2,853,282	2,398,307	1,892,558
371563	HOOPER TEL CO	A	2,440,627	2,386,966	2,225,335	2,171,981	2,130,297
371565	K & M TEL CO, INC	C	1,864,184	2,122,425	1,803,816	1,885,316	1,787,078
371567	KEYSTONE-ARTHUR TEL	C	1,976,357	1,885,507	1,597,897	1,288,821	1,118,945
371568	WINDSTREAM NE	1	646,871,100	580,940,723	511,216,867	481,645,110	438,115,330
371574	NEBRASKA CENTRAL TEL	C	26,656,598	23,011,905	22,078,666	15,619,736	13,757,561
371576	NORTHEAST NEBRASKA	C	21,008,551	20,811,515	18,962,939	17,459,653	14,453,986
371577	GREAT PLAINS COMMUN	2	79,533,992	77,276,184	81,758,137	74,241,003	65,750,818
371581	PIERCE TEL CO	A	3,756,510	3,379,901	2,913,217	2,658,289	2,309,072
371582	PLAINVIEW TEL CO	C	2,694,524	2,720,468	2,616,240	2,252,055	1,800,048
371586	ROCK COUNTY TEL CO	C	2,012,051	2,364,188	2,296,118	2,106,007	1,885,864
371590	SODTOWN TEL CO	A	180,305	195,824	170,590	167,557	164,551
371591	SE NEBRASKA COMM INC	C	13,684,149	13,477,252	12,905,400	11,525,085	10,373,629
371592	STANTON TELECOM INC.	C	2,620,342	2,650,755	2,345,882	2,288,861	1,974,799
371595	UTC OF THE WEST-NE	2	95,990,765	85,680,819	74,859,657	68,253,048	59,057,218

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371597	WAUNETA TEL CO	C	1,737,093	1,710,955	1,408,636	1,231,204	1,030,113
372455	BENKELMAN TEL CO	C	3,298,518	3,021,424	2,851,836	2,531,162	2,217,718
375143	QWEST CORP-NE	1	1,023,741,137	973,992,592	919,344,195	907,965,196	828,678,354
	NEVADA - TOTAL		5,075,081,688	4,728,762,102	4,129,906,975	3,474,657,494	2,905,890,365
552220	FILER MUTUAL TEL -NV	C	3,357,945	3,054,483	2,697,632	2,259,317	1,924,681
552223	CENTURYTEL-GEM ST-NV	2	N/A	N/A	N/A	N/A	958,284
552223	CENTURYTEL-GEM ST-NV	C	2,321,600	2,266,562	2,100,942	2,151,827	962,633
552233	RURAL TEL CO - NV	C	3,980,073	3,852,488	3,968,493	3,881,320	3,488,631
552284	BEEHIVE TEL CO - NV	C	163,137,350	210,043,211	144,111,746	9,767,147	963,932
552302	VERIZON CALIF-NV	1	150,649,216	147,503,512	141,816,681	125,290,384	99,468,090
552348	CENDEL OF NV	1	3,253,725,388	3,002,766,177	2,631,105,590	2,266,382,859	1,877,054,517
552349	CHURCHILL-CC COMM.	C	56,944,500	53,859,712	51,088,786	47,302,120	37,434,635
552351	LINCOLN CTY TEL SYS	C	11,421,693	11,155,001	8,293,258	6,505,336	5,934,161
552353	MOAPA VALLEY TEL CO.	C	10,684,841	11,435,688	10,754,932	9,671,493	8,260,715
552356	RIO VIRGIN TEL CO	C	45,775,618	45,488,852	42,860,947	39,152,715	33,487,921
553304	HUMBOLDT TEL CO	C	5,283,678	4,400,336	4,077,870	3,541,988	2,937,386
554431	CITIZENS-FRONTIER-NV	2	99,379,887	88,780,013	80,082,673	78,561,884	63,749,063
554432	CITIZENS-FRONTIER-NV	2	7,647,119	6,640,771	6,226,727	5,849,143	4,876,611
555173	NEVADA BELL	1	1,260,772,780	1,137,515,296	1,000,720,698	874,339,961	764,389,105
	NEW HAMPSHIRE - TOTAL		2,316,194,523	2,156,710,480	1,915,974,243	1,648,776,822	1,461,363,928
120038	BRETTON WOODS TEL CO	C	2,787,462	1,999,282	1,753,610	1,342,584	1,076,526
120039	GRANITE STATE TEL	C	37,287,677	32,921,545	28,087,225	25,521,419	23,059,578
120042	DIXVILLE TEL CO	A	846,105	773,961	582,597	511,318	365,289
120043	DUNBARTON TEL CO	A	6,208,907	5,583,832	4,786,423	4,159,164	4,073,893
120045	KEARSARGE TEL CO	C	42,261,048	44,245,278	30,767,609	29,702,904	26,886,992
120047	MERRIMACK COUNTY TEL	C	22,855,160	23,736,761	24,234,608	24,288,944	21,978,602
120049	UNION TEL CO	C	22,763,639	21,310,430	19,540,249	18,639,387	15,926,786
120050	WILTON TEL CO - NH	C	10,704,459	11,178,554	11,278,347	10,538,022	9,816,001
123321	MCTA, INC.	C	41,564,280	41,277,826	40,206,848	38,617,177	34,624,038
125113	NET dba FAIRPOINT-NH	1	2,128,915,786	1,973,683,011	1,754,736,727	1,495,455,903	1,323,556,223
	NEW JERSEY - TOTAL		14,430,104,232	13,303,285,997	12,478,448,576	10,742,401,918	9,855,584,226
160135	WARWICK VALLEY-NJ	2	24,006,379	10,478,357	N/A	N/A	N/A
160135	WARWICK VALLEY-NJ	C	N/A	9,927,532	18,893,256	16,351,086	14,246,083
160138	UNITED TEL - NJ, INC	1	648,868,151	577,926,957	530,363,600	478,843,679	430,032,138
165120	VERIZON NEW JERSEY	1	13,757,229,702	12,704,953,151	11,929,191,720	10,247,207,153	9,411,306,005
	NEW MEXICO - TOTAL		2,980,425,558	2,809,099,257	2,571,252,003	2,296,788,527	1,968,522,847
491164	WINDSTREAM SW-NM#1	2	142,491,544	134,852,883	121,044,170	113,017,199	94,964,007
491193	WINDSTREAM SW-NM#2	2	140,429,808	130,672,409	113,423,952	103,242,843	91,316,323
491231	MESCALERO APACHE	C	2,307,131	1,714,348	1,250,929	1,775,073	1,308,008
492066	DELL TEL CO-OP - NM	C	1,708,547	1,749,649	1,554,351	1,661,974	1,880,491
492176	VALLEY TEL COOP - NM	C	6,102,307	6,030,773	5,764,332	4,275,229	4,314,319
492259	BACA VALLEY TEL CO	C	3,729,493	3,164,851	2,954,957	2,465,933	2,285,246
492262	ENMR TEL COOP INC-NM	C	42,255,041	40,986,503	35,036,086	31,097,556	26,779,838
492263	LA JICARITA RURAL	C	10,443,944	8,231,493	7,152,778	6,915,010	6,096,325
492264	LEACO RURAL TEL COOP	C	8,720,622	7,609,536	6,459,629	5,763,577	5,017,128
492265	Tularosa Basin Tel.	C	17,007,746	15,256,942	14,101,019	13,071,399	11,826,028
492268	WESTERN NEW MEXICO	C	32,572,721	31,629,013	29,871,146	28,124,456	24,643,846
492270	PENASCO VALLEY TEL	C	12,896,749	12,067,933	10,741,036	10,068,310	8,888,905
492272	ROOSEVELT CNTY RURAL	C	6,175,744	4,422,424	5,434,699	5,355,247	4,417,485
492274	CENTURYTEL SW-NM	2	N/A	N/A	N/A	N/A	6,320,055
492274	CENTURYTEL SW-NM	C	20,785,198	19,066,371	15,817,678	14,295,204	6,528,037
493403	SACRED WIND	C	N/A	223,696	5,905,164	4,774,631	3,595,697
494449	NAVAJO-NM-FRONTIER	2	30,363,608	26,282,142	20,933,707	18,351,019	15,711,001
495105	QWEST CORP-NM	1	2,502,435,355	2,365,138,291	2,173,806,370	1,932,533,867	1,652,630,108
	NEW YORK - TOTAL		21,836,943,428	20,565,706,418	19,368,581,396	17,184,396,516	15,360,970,058
150071	ARMSTRONG TEL CO-NY	C	10,337,129	9,783,086	9,135,220	8,545,944	8,453,424
150072	FRONTIER-AUSABLE VAL	2	18,855,951	15,635,358	15,279,375	13,959,895	11,715,359
150073	BERKSHIRE TEL CORP	C	17,050,773	16,310,204	13,581,185	10,454,374	8,704,258
150076	CASSADAGA TEL CORP	A	3,012,792	2,602,518	2,211,721	1,747,100	1,497,819
150077	CHAMPLAIN TEL CO	C	20,630,859	20,148,096	20,239,012	18,948,925	17,286,559

Table 8.3
Total ILEC Interstate Access Minutes by Study Area

Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
150078	CHAUTAUQUA & ERIE	C	30,062,678	26,662,734	24,916,387	21,358,332	18,099,766
150079	CHAZY & WESTPORT	C	10,010,417	9,469,812	9,140,075	7,757,104	6,839,907
150081	CITIZENS HAMMOND NY	C	3,689,570	3,287,062	2,900,815	2,727,785	2,328,994
150084	TACONIC TEL CORP	C	83,274,178	80,214,636	72,689,043	69,629,225	64,723,115
150085	CROWN POINT TEL CORP	C	3,101,856	3,097,620	2,855,821	2,446,260	2,189,837
150088	DELHI TEL CO	C	12,167,019	10,905,215	9,672,416	9,225,567	8,129,470
150089	DEPOSIT TEL CO	C	21,041,375	23,229,668	20,163,038	19,170,147	18,684,133
150091	DUNKIRK & FREDONIA	C	15,812,062	13,717,749	11,042,773	9,779,361	8,284,824
150092	EDWARDS TEL CO	C	4,344,330	5,012,728	4,998,295	4,378,037	3,834,871
150093	EMPIRE TEL CORP	C	18,828,762	16,489,559	14,770,156	13,082,103	11,078,185
150095	FISHERS ISLAND TEL	C	2,569,513	2,405,640	2,478,078	1,754,749	1,507,923
150097	GERMANTOWN TEL CO	C	7,690,143	7,104,653	5,747,449	4,816,068	4,320,575
150099	HANCOCK TEL CO	C	5,366,044	4,843,937	4,391,051	4,219,711	3,683,594
150100	FRONTIER COMM OF NY	2	231,884,498	199,249,570	203,385,904	170,774,970	138,362,602
150104	MARGARETVILLE TEL CO	C	12,218,455	12,031,776	9,815,029	6,685,353	4,978,783
150105	MIDDLEBURGH TEL CO	C	15,568,928	13,844,004	12,628,683	11,501,571	10,048,515
150106	WINDSTREAM NY-FULTON	2	N/A	N/A	N/A	27,898,854	50,434,270
150106	WINDSTREAM NY-FULTON	C	95,351,732	78,321,233	65,933,529	30,127,385	N/A
150107	NEWPORT TEL CO	C	7,238,900	6,511,706	5,889,436	5,603,149	4,879,206
150108	NICHOLVILLE TEL CO	C	6,891,947	6,858,890	6,168,256	4,900,480	4,078,142
150109	WINDSTREAM-JAMESTOWN	2	N/A	N/A	N/A	42,039,446	74,054,186
150109	WINDSTREAM-JAMESTOWN	C	123,204,670	107,862,520	92,238,851	43,640,591	N/A
150110	OGDEN TEL DBA FRNTER	2	40,078,669	34,862,684	28,208,343	25,276,064	27,091,169
150111	ONEIDA COUNTY RURAL	C	7,234,475	6,815,923	5,856,847	4,917,814	4,140,727
150112	ONTARIO TEL CO, INC.	C	8,421,535	7,463,243	6,725,824	5,717,701	4,839,954
150113	WINDSTREAM RED JACKT	2	N/A	N/A	N/A	1,184,664	2,127,820
150113	WINDSTREAM RED JACKT	C	5,342,988	3,858,726	2,787,685	1,266,363	N/A
150114	ORISKANY FALLS TEL	C	1,172,694	1,325,612	1,293,665	1,002,958	880,490
150116	PATTERSONVILLE TEL	C	2,745,911	2,519,056	2,241,551	1,802,965	1,477,142
150118	PORT BYRON TEL CO	C	5,598,704	6,313,294	5,995,810	5,418,896	4,754,446
150121	FRONTIER-ROCHESTER	1	1,030,003,817	912,518,520	805,816,210	721,321,922	628,906,530
150122	FRONTIER-SENECA GORH	2	17,710,435	17,419,963	15,153,384	14,368,957	15,233,979
150125	STATE TEL CO	A	23,060,955	19,597,452	16,603,336	15,061,651	12,878,927
150128	FRONTIER-SYLVAN LAKE	2	64,788,037	49,799,491	42,314,582	35,513,765	33,164,187
150129	TOWNSHIP TEL CO	C	9,253,947	10,041,958	8,272,109	6,742,629	5,787,332
150131	TRUMANSBURG TEL CO.	C	15,638,681	13,830,787	12,441,052	11,516,522	10,011,061
150133	VERNON TEL CO	C	4,775,584	5,355,288	4,641,386	4,126,217	3,496,267
150135	WARWICK VALLEY-NY	2	67,133,331	24,619,500	N/A	N/A	N/A
150135	WARWICK VALLEY-NY	C	N/A	21,900,901	38,715,327	34,271,031	29,265,447
154532	CITIZENS-FRONTIER-NY	1	667,686,899	602,588,737	500,080,154	471,299,282	408,635,002
154533	CITIZENS-FRONTIER-NY	1	43,354,114	40,273,391	35,462,290	34,903,585	34,058,136
154534	CITIZENS-FRONTIER-NY	1	72,197,224	66,531,665	61,289,060	58,458,742	50,130,211
155130	VERIZON NEW YORK	1	18,970,540,847	18,022,470,253	17,132,411,183	15,163,052,302	13,595,892,914
	NORTH CAROLINA - TOTAL		12,801,931,748	11,881,252,713	10,900,318,568	10,089,963,180	8,736,307,774
230468	ATLANTIC MEMBERSHIP	C	119,264,953	114,516,670	114,767,746	114,201,132	105,319,882
230469	BARNARDSVILLE TEL CO	C	4,137,727	4,277,455	3,820,194	3,579,790	3,293,674
230470	CAROLINA TEL & TEL	1	3,522,077,512	3,134,856,342	2,796,690,385	2,576,173,634	2,170,531,837
230471	CENDEL OF NC	2	681,459,668	627,754,999	576,841,774	517,900,395	441,276,700
230473	CITIZENS TEL CO	C	63,138,284	59,062,195	55,062,858	50,121,174	45,275,911
230474	WINDSTREAM CONCORD	2	N/A	N/A	N/A	128,142,795	239,130,334
230474	WINDSTREAM CONCORD	C	264,651,488	250,796,641	251,145,961	131,789,457	N/A
230476	WINDSTREAM NC	2	N/A	N/A	N/A	311,737,217	547,513,095
230476	WINDSTREAM NC	C	750,594,266	742,318,322	698,947,799	334,925,567	N/A
230478	ELLERBE TEL CO	A	6,309,605	5,259,884	4,684,222	3,912,976	3,232,186
230479	VERIZON SOUTH-NC	1	603,213,960	544,870,702	489,066,990	381,829,549	355,326,610
230483	WINDSTREAM LEXCOM	C	72,079,983	69,400,144	67,249,830	71,178,990	59,580,223
230485	MEBTTEL, INC.	2	N/A	N/A	N/A	N/A	16,952,986
230485	MEBTTEL, INC.	C	32,410,784	41,603,984	42,667,563	39,762,769	17,133,158
230491	N.ST. dba N. ST.COMM	A	363,715,893	378,986,562	313,529,805	266,232,792	214,735,666
230494	PINEVILLE TEL CO	A	6,152,187	5,385,225	5,035,969	5,136,742	4,325,067

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230495	RANDOLPH TEL CO	A	8,671,537	8,194,564	7,702,170	7,227,776	7,138,980
230496	RANDOLPH MEMBERSHIP	A	17,155,098	16,604,363	15,226,344	14,620,901	14,170,631
230497	PIEDMONT MEMBERSHIP	A	6,561,725	6,687,514	5,349,014	5,443,809	4,840,518
230498	SALUDA MOUNTAIN TEL	C	9,134,616	9,788,942	4,941,075	4,682,645	4,256,382
230500	SERVICE TEL CO	A	4,575,056	4,171,655	3,484,098	2,911,681	2,622,209
230501	SKYLINE MEMBERSHIP	A	95,659,141	87,506,858	82,336,920	76,876,704	69,834,165
230502	STAR MEMBERSHIP CORP	C	68,845,742	52,155,371	50,196,782	38,482,079	36,403,984
230503	SURRY MEMBERSHIP	A	40,811,295	36,204,968	34,205,924	34,759,708	29,183,422
230505	TRI COUNTY TEL MEMBR	A	7,402,046	6,426,786	6,206,424	5,631,497	5,881,767
230509	VERIZON S-NC(CONTEL)	1	451,641,429	435,536,096	410,581,365	386,149,280	337,263,606
230510	WILKES MEMBERSHIP	C	25,815,254	25,272,315	19,818,640	18,658,595	17,199,516
230511	YADKIN VALLEY TEL	A	74,525,953	69,530,205	58,748,514	56,720,718	50,095,970
235193	SOUTHERN BELL-NC	1	5,501,926,546	5,144,083,951	4,782,010,202	4,501,172,808	3,933,789,295
	NORTH DAKOTA - TOTAL		925,274,748	827,560,431	727,572,129	685,008,478	608,435,831
381447	NORTH DAKOTA TEL CO	C	44,419,147	39,724,612	36,436,312	34,183,863	30,252,939
381509	WOLVERTON TEL CO	A	822,132	763,175	616,684	561,790	455,805
381601	ABSAKARA COOP TEL CO	A	81,450	71,862	63,144	67,615	79,266
381604	BEK COMM. COOP.	C	18,739,076	17,078,027	15,905,515	17,124,872	15,762,997
381607	CONSOLIDATED TELCOM	C	27,923,510	26,658,341	24,016,551	24,812,432	21,641,565
381610	DAKOTA CENTRAL COOP	C	13,121,193	11,821,164	10,658,047	10,203,540	9,517,437
381611	DICKEY RURAL COOP	C	35,841,058	32,216,885	29,586,703	28,125,842	24,367,601
381614	POLAR COMM MUT AID-A	A	8,180,632	6,958,224	6,416,998	6,561,702	5,762,263
381615	GRIGGS COUNTY TEL CO	A	5,875,579	4,701,833	4,255,850	4,029,895	3,808,533
381616	INTER-COMMUNITY TEL	C	7,679,666	7,006,985	5,930,231	5,462,946	4,767,374
381617	MIDSTATE TEL CO	C	5,487,960	5,166,149	4,941,207	4,719,648	4,186,559
381622	MOORE & LIBERTY TEL	A	2,533,427	2,392,763	2,119,706	2,010,758	1,876,131
381623	NOONAN FARMERS TEL	A	896,389	N/A	N/A	N/A	N/A
381625	NORTHWEST COMM COOP	A	13,723,635	13,566,976	12,130,393	11,847,386	11,122,347
381630	POLAR COMM MUT AID	C	21,282,960	18,449,254	16,433,133	18,228,474	16,098,419
381631	RED RIVER RURAL TEL	C	14,053,850	13,417,093	11,900,833	10,449,414	9,813,700
381632	RESERVATION TEL COOP	C	25,955,284	25,258,571	22,681,059	21,791,236	21,706,774
381636	UNITED TEL MUTUAL	C	29,378,115	26,973,755	25,429,279	24,914,652	22,569,194
381637	W. RIVER TELECOM.	C	44,468,353	42,166,348	36,484,485	35,798,964	32,720,312
381638	MIDSTATE COMM.	A	4,104,090	3,737,620	3,540,046	3,157,108	2,937,573
382247	NEMONT TEL COOP - ND	C	32,187,006	30,621,784	24,795,101	25,236,443	23,605,104
383303	SRT COMMUNICATIONS	A	129,194,654	112,254,565	102,503,625	95,857,372	85,607,683
385144	QWEST CORP-ND	1	439,325,582	386,554,445	330,727,227	299,862,526	259,776,255
	NORTHERN MARIANA ISLANDS - TOTAL		62,756,075	56,261,254	51,743,041	47,593,573	47,137,801
653700	MICRONESIAN TELECOMM	2	62,756,075	56,261,254	51,743,041	47,593,573	47,137,801
	OHIO - TOTAL		13,523,538,000	12,524,152,922	11,632,112,538	10,548,312,313	9,074,948,347
300585	ARCADIA TEL CO	A	1,425,111	1,279,081	1,126,646	1,040,305	910,051
300586	THE ARTHUR MUTUAL	A	2,903,960	3,311,953	3,312,140	3,099,709	2,514,429
300588	AYERSVILLE TEL CO	A	3,136,555	2,981,044	2,847,587	2,788,827	2,532,447
300589	BASCOM MUTUAL TEL CO	A	3,132,779	2,090,267	2,194,902	1,895,780	2,362,153
300590	BENTON RIDGE TEL CO	A	2,844,128	2,701,554	1,963,601	1,879,330	1,633,815
300591	BUCKLAND TEL. CO.	A	1,846,222	1,596,136	1,299,557	1,172,276	932,596
300594	THE CHAMPAIGN TEL CO	C	19,609,828	19,337,779	18,682,947	14,420,994	11,953,722
300597	THE CHILLICOTHE TEL	C	74,551,451	67,107,006	75,948,821	63,004,955	39,672,349
300598	MCCLURE TEL CO	C	1,109,188	1,340,178	2,379,347	980,343	854,548
300604	COLUMBUS GROVE TEL	A	3,091,734	2,804,618	2,695,695	2,196,629	1,800,238
300606	CONNEAUT TEL CO	C	19,780,043	18,711,893	17,278,216	15,672,509	13,263,162
300607	CONTINENTAL OF OHIO	C	4,076,840	4,298,620	4,546,708	4,520,263	4,069,125
300609	DOYLESTOWN TEL CO	A	6,964,414	6,633,435	5,996,338	5,409,982	4,854,633
300612	FARMERS MUTUAL TEL	C	961,708	842,302	740,135	624,379	550,472
300613	LITTLE MIAMI COMM.	C	5,603,947	5,989,964	5,423,845	4,837,396	4,143,770
300614	FORT JENNINGS TEL CO	A	1,329,274	1,170,130	769,105	513,252	438,075
300615	VERIZON NORTH-OH	1	1,893,051,405	1,688,414,505	1,497,446,293	1,350,650,504	1,123,273,082
300618	GERMANTOWN INDEPEND	C	9,347,194	8,269,721	7,221,197	5,703,588	4,268,559
300619	GLANDORF TEL CO	A	1,382,700	1,312,160	1,091,100	1,275,797	811,886
300625	KALIDA TEL CO	A	2,952,148	2,728,149	2,183,098	2,030,610	1,848,213

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300630	CENTURYTEL OF OHIO	2	N/A	N/A	N/A	N/A	51,633,124
300630	CENTURYTEL OF OHIO	C	220,775,766	174,327,141	157,654,082	133,041,458	57,371,036
300633	MIDDLE POINT HOME	A	1,517,361	1,297,180	1,186,564	858,022	641,909
300634	MINFORD TEL CO	A	9,718,993	10,053,809	8,460,213	7,403,404	7,150,006
300639	THE NEW KNOXVILLE	A	2,333,928	2,134,232	1,628,710	1,412,138	1,410,354
300644	THE NOVA TEL CO	C	2,977,302	2,452,399	2,014,807	2,147,914	2,137,490
300645	OAKWOOD TEL CO	A	3,580,071	3,207,760	3,115,072	3,433,756	2,771,492
300649	ORWELL TEL CO	C	16,055,311	14,030,494	12,771,293	9,822,197	8,592,787
300650	OTTOVILLE MUTUAL	A	2,443,354	2,054,766	1,957,367	1,577,547	1,649,821
300651	PATTERSONVILLE TEL	A	1,222,047	1,288,693	921,710	747,304	674,101
300654	RIDGEVILLE TEL CO	A	3,066,694	2,664,487	2,970,976	2,292,039	2,063,943
300656	SHERWOOD MUTUAL TEL	A	2,314,564	2,121,516	1,929,354	1,757,558	1,563,287
300658	SYCAMORE TEL CO	C	2,940,175	3,132,942	3,051,002	2,810,789	2,555,196
300659	TELEPHONE SERVICE	A	19,161,795	16,559,261	18,147,971	14,009,370	11,079,663
300661	UTC OF OHIO	1	1,416,714,784	1,170,677,837	990,649,493	897,929,432	740,106,717
300662	VANLUE TEL CO	A	1,204,529	1,246,659	1,116,096	923,277	825,799
300663	VAUGHNSVILLE TEL CO	A	705,344	533,597	380,459	323,587	231,639
300664	WABASH MUTUAL TEL CO	A	1,598,697	1,311,719	1,441,503	1,599,090	1,403,110
300665	WINDSTREAM OH	2	N/A	N/A	N/A	98,552,590	183,070,019
300665	WINDSTREAM OH	C	284,280,887	260,532,189	238,070,396	105,075,294	N/A
300666	WINDSTREAM W-RESERVE	2	N/A	N/A	N/A	202,214,440	361,856,369
300666	WINDSTREAM W-RESERVE	C	576,898,533	511,971,936	503,411,988	230,825,857	N/A
300682	FRONTIER-MI-OH	2	2,052,673	1,995,782	2,035,674	1,876,415	1,697,815
305062	CINCINNATI BELL-OH	1	1,725,902,876	1,632,520,246	1,572,576,761	1,455,702,034	1,312,949,639
305150	OHIO BELL TEL CO	1	7,166,971,687	6,865,117,782	6,451,473,769	5,888,259,373	5,098,825,706
	OKLAHOMA - TOTAL		4,687,944,390	4,225,469,582	3,579,021,302	3,184,449,492	2,899,909,163
431165	WINDSTREAM SW-OK	2	261,083,566	230,050,519	193,878,790	170,479,956	152,005,129
431704	LAVACA TEL CO-OK	C	4,735,079	4,062,931	3,460,719	2,860,710	2,130,226
431788	KANOKLA TEL ASSN-OK	C	3,383,392	3,507,875	3,377,542	3,000,006	2,567,985
431831	S. CENTRAL TEL - OK	C	38,453,101	1,473,290	822,987	482,903	435,223
431965	WINDSTREAM OK	2	N/A	N/A	N/A	15,255,453	28,203,903
431965	WINDSTREAM OK	C	42,379,054	42,048,772	35,352,844	16,010,475	N/A
431966	ATLAS TEL CO	C	6,336,402	30,479,955	5,500,577	3,282,335	2,494,750
431968	BEGGS TEL CO	A	4,526,807	4,009,431	3,731,046	3,797,259	3,279,419
431969	BIXBY TEL CO	C	25,658,478	25,655,987	21,555,512	18,627,794	16,022,602
431974	CANADIAN VALLEY TEL	C	4,298,237	3,821,390	3,429,453	3,183,059	2,665,306
431976	CARNEGIE TEL CO INC	C	4,039,254	3,967,252	3,621,589	2,745,149	2,507,825
431977	CENTRAL OKLAHOMA TEL	C	6,695,155	6,205,162	5,486,383	4,850,811	5,486,984
431979	CHEROKEE TEL CO	C	21,702,738	20,478,575	18,301,144	15,733,270	12,790,236
431980	CHICKASAW TEL CO	C	26,260,933	25,168,855	24,369,119	21,487,585	18,341,594
431981	CHOUTEAU TEL CO	C	8,042,929	7,949,423	7,199,293	6,418,504	5,833,875
431982	CIMARRON TEL CO	C	16,647,973	14,906,054	13,761,210	11,950,860	11,006,657
431984	OKLAHOMA COMM SYSTEM	C	62,763,845	71,434,697	35,700,623	32,063,005	28,993,021
431985	CROSS TEL CO	C	31,925,541	28,608,761	24,186,100	21,622,096	18,963,231
431988	DOBSON TEL CO	C	17,236,512	9,896,822	8,405,361	6,823,536	5,829,944
431994	GRAND TEL CO INC	C	11,427,297	10,345,087	10,103,367	9,434,443	8,561,771
431995	HINTON TEL CO	C	7,874,708	7,604,354	6,809,594	5,630,442	5,113,879
432006	MCLOUD TEL CO	C	18,350,693	16,808,800	15,163,817	13,801,542	12,372,330
432008	MEDICINE PARK TEL CO	C	2,496,320	2,278,170	2,060,133	1,813,897	1,758,064
432010	MID-AMERICA TEL INC	C	7,747,364	9,259,534	3,698,180	3,192,220	2,963,248
432011	OKLAHOMA WINDSTREAM	2	N/A	N/A	N/A	22,987,775	42,448,652
432011	OKLAHOMA WINDSTREAM	C	70,511,204	62,819,158	55,138,770	24,658,427	N/A
432013	OKLAHOMA TEL & TEL	C	6,115,632	7,055,915	5,128,150	3,851,598	3,138,302
432014	OKLAHOMA WESTERN TEL	C	15,253,362	14,905,971	11,885,247	9,905,228	8,585,681
432016	PANHANDLE TEL COOP	C	79,156,407	95,496,329	92,024,911	79,113,112	78,854,766
432017	PINE TELEPHONE CO	C	26,459,575	28,079,269	23,901,332	19,222,063	27,827,550
432018	PIONEER TEL COOP INC	C	138,054,382	127,308,018	110,377,252	101,882,347	92,265,907
432020	POTTAWATOMIE TEL CO	C	7,059,114	6,574,811	6,357,990	5,702,266	5,311,336
432022	SALINA-SPAVINAW TEL	C	25,033,576	21,655,116	20,818,700	18,293,080	18,272,310
432023	SHIDLER TEL CO	C	2,294,453	2,145,678	1,871,608	1,609,408	1,399,934

Table 8.3
Total ILEC Interstate Access Minutes by Study Area

Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
432025	SW OKLAHOMA TEL CO	C	2,531,768	2,375,090	2,028,173	1,671,925	1,714,335
432029	TERRAL TEL CO	C	1,413,216	1,297,227	1,291,065	1,078,883	960,591
432030	TOTAH COMMUNICATIONS	C	6,133,687	5,349,051	4,874,533	3,864,699	3,125,696
432032	VALLIANT TEL CO	C	8,994,756	8,432,171	7,666,028	6,553,875	5,376,791
432034	WYANDOTTE TEL CO	C	3,493,107	3,333,914	3,037,469	2,663,029	2,317,355
432141	SANTA ROSA TEL COOP	A	2,107,986	2,088,148	2,198,207	1,782,452	1,429,400
435215	SOUTHWESTERN BELL-OK	1	3,659,266,787	3,256,532,020	2,780,446,484	2,485,062,015	2,256,553,355
	OREGON - TOTAL		5,177,363,856	4,758,560,612	4,276,587,711	3,785,895,416	3,231,310,029
532226	MIDVALE TEL EXCH -OR	C	1,322,337	1,538,156	1,230,944	1,122,255	995,674
532359	BEAVER CREEK COOP	C	10,691,690	8,930,525	9,423,289	8,784,847	7,423,230
532361	CENTURYTEL-OREGON	2	N/A	N/A	N/A	N/A	70,782,847
532361	CENTURYTEL-OREGON	C	226,350,316	208,575,335	183,134,555	166,240,131	76,521,968
532362	CANBY TEL ASSN	C	28,744,028	26,334,964	24,364,703	21,667,167	18,595,922
532363	CLEAR CREEK MUTUAL	C	9,364,938	8,790,017	8,145,020	7,746,306	6,876,942
532364	COLTON TEL CO	C	2,722,069	2,491,709	2,311,535	1,982,380	1,578,826
532369	EAGLE TEL SYSTEMS	C	1,996,312	2,010,831	1,829,712	1,764,872	1,587,943
532371	CASCADE UTIL INC	C	25,119,050	23,333,708	21,506,248	19,260,080	17,805,189
532373	GERVAIS TELEPHONE CO	C	2,545,701	2,646,686	2,335,032	1,975,090	1,567,704
532375	ROOME TELECOMM INC	C	2,798,675	2,225,709	1,956,080	1,788,946	1,478,832
532376	HELIX TEL CO.	C	988,289	913,298	825,304	796,486	637,838
532377	HOME TELEPHONE CO	C	1,577,206	1,760,603	1,663,303	1,649,146	1,414,403
532378	TRANS-CASCADES TEL	C	1,041,215	1,046,121	842,749	779,997	809,158
532383	MOLALLA TEL CO.	C	14,118,918	11,079,760	10,775,444	11,595,195	9,183,108
532384	MONITOR COOP TEL	C	1,572,491	1,520,554	1,333,829	1,280,197	1,101,121
532385	MONROE TELEPHONE CO.	C	3,284,151	2,996,884	2,330,088	1,935,151	1,796,123
532386	MT. ANGEL TEL CO.	A	4,560,260	4,673,913	3,880,982	3,339,211	2,983,222
532387	NEHALEM TELECOMM.	C	7,096,675	6,566,694	5,889,269	4,934,818	3,979,049
532388	NORTH STATE TEL CO.	C	2,409,777	2,240,900	1,795,481	1,675,343	1,424,740
532389	OREGON TEL CORP	C	7,481,085	7,722,987	5,717,737	4,830,159	4,931,220
532390	OREGON-IDAHO UTIL.	C	4,880,486	4,934,091	4,382,718	4,008,600	3,700,810
532391	PEOPLES TEL CO. - OR	C	3,657,142	3,184,061	2,498,425	2,236,654	1,821,105
532392	PINE TEL SYSTEM INC.	C	4,864,602	4,537,012	3,420,453	3,077,563	2,856,755
532393	PIONEER TEL COOP	C	45,917,338	42,449,850	38,969,861	36,610,281	33,146,165
532396	ST PAUL COOP ASSN	A	1,401,104	1,398,184	1,240,982	1,079,214	918,532
532397	SCIO MUTUAL TEL ASSN	C	5,459,481	5,204,491	4,700,806	4,250,950	3,606,568
532399	STAYTON COOP TEL CO	C	28,211,214	29,972,010	28,638,968	27,512,985	18,317,978
532400	UTC OF THE NW - OR	2	213,486,438	189,316,488	178,634,864	158,725,942	131,956,188
532404	ASOTIN TEL - OR	C	614,823	724,955	702,054	672,544	650,125
532416	VERIZON N'WEST-OR	1	1,130,274,317	1,025,322,144	965,974,140	853,266,842	749,517,121
532456	MALHEUR HOME TEL CO	2	55,952,598	54,422,534	49,117,162	45,682,607	39,751,759
533401	CITIZENS-FRONTIER-OR	2	47,258,092	45,451,899	47,021,313	48,590,512	42,674,876
535163	QWEST CORP-OR	1	3,279,601,038	3,024,243,539	2,659,994,661	2,335,032,945	1,968,916,988
	PENNSYLVANIA - TOTAL		16,209,157,141	15,324,849,014	13,895,646,296	12,685,420,213	11,186,609,526
170145	BENTLEYVILLE TEL CO	A	5,953,804	4,383,833	4,289,657	5,413,454	4,832,790
170149	FRONTIER-BREEZEWOOD	2	16,778,056	14,449,068	13,038,065	11,245,116	9,437,302
170151	WINDSTREAM BUFFALO	A	44,953,954	40,862,822	37,996,709	32,725,136	27,506,751
170152	FRONTIER-CANTON	2	12,441,538	13,070,238	11,998,747	12,255,864	9,619,267
170156	CITIZENS - KECKSBURG	A	10,718,626	11,214,754	9,187,985	7,393,224	6,160,503
170161	COMMONWEALTH TEL CO	A	631,916,306	609,305,058	580,771,783	505,357,605	461,833,613
170162	WINDSTREAM CONESTOGA	A	110,592,666	101,149,484	97,583,634	92,449,273	114,252,168
170165	WINDSTREAM D&E	A	120,464,857	112,171,413	108,655,855	99,491,298	97,337,637
170168	FRONTIER-PA	2	60,979,273	55,492,512	56,430,554	58,293,723	61,187,395
170169	VERIZON NORTH-PA	1	1,237,075,672	1,169,250,423	1,044,153,759	901,726,764	785,406,249
170170	VERIZON N-PA(CONTEL)	1	159,928,545	139,796,474	119,753,604	105,766,962	93,491,232
170171	HICKORY TEL CO	A	3,453,987	2,663,179	2,952,487	2,593,217	2,565,335
170175	IRONTON TEL CO	A	19,186,698	13,261,177	8,943,122	8,355,260	7,231,047
170176	WINDSTREAM PA	2	N/A	N/A	N/A	193,825,099	370,864,575
170176	WINDSTREAM PA	C	537,819,150	495,567,196	433,835,531	203,403,620	N/A
170177	LACKAWAXEN TELECOM	C	15,793,351	13,249,800	11,166,940	9,562,128	8,298,754
170178	FRONTIER-LAKEWOOD	2	3,274,584	2,962,481	2,754,400	2,665,281	2,517,666

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170179	LAUREL HIGHLAND TEL	A	10,362,589	9,201,254	8,712,618	8,714,063	9,376,828
170183	MAHANOEY & MAHANTANGO	C	5,405,771	5,594,384	5,260,165	5,631,516	6,056,640
170185	MARIANNA - SCENERY	C	5,929,529	5,150,379	4,825,524	4,480,865	4,332,966
170189	ARMSTRONG TEL CO-PA	C	4,301,988	3,905,453	3,603,185	3,710,979	3,675,857
170191	NORTH-EASTERN PA TEL	A	39,948,467	41,784,447	35,372,056	35,395,370	34,246,917
170192	NORTH PENN TEL CO	C	23,099,701	21,478,083	18,747,166	18,755,046	18,299,436
170193	CONSOLIDATED COMM-PA	A	220,441,852	206,753,723	198,289,026	211,957,397	233,666,335
170194	FRONTIER-OSWAYO RIVR	2	10,720,807	9,891,553	9,377,969	8,958,049	7,664,386
170195	ARMSTRONG TEL NORTH	A	1,715,017	1,671,191	1,589,821	1,645,908	1,976,779
170196	PALMERTON TEL CO	A	33,427,497	29,371,790	27,659,104	27,153,916	24,136,740
170197	PENNSYLVANIA TEL CO	A	3,916,049	3,453,327	1,914,914	1,895,895	1,882,012
170200	PYMATUNING IND TEL	A	5,979,798	6,123,598	5,365,024	5,041,389	3,982,404
170201	VERIZON N-PA(QUAKER)	1	144,560,070	142,691,234	126,910,023	112,324,950	96,211,274
170204	SOUTH CANAAN TEL CO	A	7,230,185	7,375,462	5,683,211	4,611,196	4,297,026
170206	SUGAR VALLEY TEL CO	C	1,992,481	2,190,299	1,917,587	1,994,948	2,084,240
170209	THE UTC OF PA	1	999,392,233	939,318,723	836,189,004	759,920,720	640,730,093
170210	VENUS TEL CORP	A	2,649,500	3,158,818	2,884,626	2,798,203	2,595,615
170215	YUKON - WALTZ TEL CO	A	2,952,897	2,539,532	2,529,465	2,779,247	2,718,611
170277	WEST SIDE TEL CO-PA	A	141,797	133,343	144,940	147,751	125,900
175000	VERIZON PENNSYLVANIA	1	11,693,657,846	11,084,212,509	10,055,158,036	9,214,979,781	8,026,007,183
	PUERTO RICO - TOTAL		3,336,356,968	3,491,787,656	3,418,956,841	3,426,205,566	3,213,892,965
633200	P R T C - CENTRAL	1	286,466,000	293,544,152	240,753,881	212,100,246	172,530,857
633201	PUERTO RICO TEL CO	1	3,049,890,968	3,198,243,504	3,178,202,960	3,214,105,320	3,041,362,108
	RHODE ISLAND - TOTAL		1,119,103,675	993,938,528	896,013,249	814,300,414	734,084,525
585114	VERIZON RHODE ISLAND	1	1,119,103,675	993,938,528	896,013,249	814,300,414	734,084,525
	SOUTH CAROLINA - TOTAL		6,387,164,402	6,016,119,217	5,603,329,417	5,142,939,134	4,516,202,048
240479	VERIZON SOUTH-SC	1	494,726,018	413,803,363	365,149,641	347,531,877	275,784,648
240506	UTC OF THE CAROLINAS	2	321,655,624	311,024,438	290,549,468	270,563,163	246,658,464
240512	BLUFFTON TEL. CO.	C	97,155,416	103,247,909	105,442,762	104,836,278	94,492,185
240515	CHESNEE TEL CO	A	13,103,933	11,878,412	10,861,305	10,716,073	10,243,154
240516	CHESTER TEL CO - SC	A	50,347,385	47,169,312	46,950,647	43,971,256	36,403,523
240517	WINDSTREAM SC	2	N/A	N/A	N/A	58,562,445	105,847,455
240517	WINDSTREAM SC	C	181,912,603	179,232,031	172,494,677	79,809,392	N/A
240520	FARMERS TEL COOP	C	198,491,096	166,005,736	156,146,603	131,178,171	124,730,671
240521	FORT MILL TEL CO	C	122,291,518	133,188,432	142,905,584	150,274,799	143,196,917
240523	HARGRAY TEL CO	C	237,350,505	237,275,478	196,068,139	153,581,348	124,379,611
240526	VERIZON S-SC(CONTEL)	1	76,820,274	65,432,534	59,157,333	52,675,242	40,720,381
240527	HOME TEL CO	C	55,915,363	56,298,399	51,243,066	50,473,394	54,551,725
240528	HORRY TEL COOP	C	370,284,086	335,155,620	291,226,204	251,816,270	211,194,302
240531	LANCASTER TEL CO	C	69,922,194	65,983,491	59,378,372	54,269,414	48,978,577
240532	LOCKHART TEL CO INC	A	991,153	946,448	725,260	594,817	655,157
240533	MCCLELLANVILLE TEL	C	5,981,169	5,465,639	4,951,976	4,625,234	4,090,321
240535	NORWAY TEL CO	A	1,930,580	1,978,884	1,999,033	2,211,330	1,513,124
240536	PALMETTO RURAL COOP	A	40,497,623	39,010,377	36,705,331	36,846,845	32,409,112
240538	PIEDMONT RURAL COOP	C	36,497,858	35,375,839	30,360,814	28,994,591	27,975,675
240539	PBT TELECOM, INC.	C	41,748,759	39,299,517	36,438,506	34,120,713	30,516,955
240541	RIDGEWAY TEL CO	A	8,017,929	7,926,679	7,532,350	7,117,565	5,926,657
240542	ROCK HILL TEL CO	C	182,231,426	173,161,652	162,505,214	153,981,010	147,442,014
240544	ST STEPHEN TEL CO	C	18,927,238	18,974,487	17,805,316	16,600,652	14,185,748
240546	SANDHILL TEL COOP	A	57,067,967	54,585,624	47,633,832	43,494,767	37,927,864
240550	WEST CAROLINA RURAL	C	32,995,380	32,340,506	33,494,591	33,321,738	31,541,328
240551	WILLISTON TEL CO	C	14,923,530	15,564,582	13,963,055	12,723,147	11,255,357
245194	SOUTHERN BELL-SC	1	3,655,377,775	3,465,793,828	3,261,640,338	3,008,047,603	2,653,581,123
	SOUTH DAKOTA - TOTAL		1,004,798,552	978,901,833	1,118,826,067	848,209,765	638,110,899
391405	HILLS TEL CO-SD	A	942,768	1,453,333	1,235,460	1,247,645	1,240,986
391640	GOLDEN WEST-ARMOUR	A	4,604,211	4,273,452	3,933,994	3,417,984	3,018,320
391642	ALLIANCE-BALTIC	A	10,636,729	8,697,891	7,356,177	6,926,685	5,789,546
391647	CHEYENNE RIVER SIOUX	C	11,029,212	10,548,051	10,081,028	9,949,466	8,013,916
391649	BERESFORD MUNICIPAL	A	3,411,914	3,206,958	2,809,463	2,676,391	2,386,354
391650	CITY OF BROOKINGS	A	48,455,074	44,190,541	46,380,111	45,525,253	36,179,959

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391652	KNOLOGY COMM TEL	C	17,255,856	15,228,022	13,405,649	11,682,466	9,374,016
391653	CITY OF FAITH MUNIC	A	971,356	869,018	729,616	616,680	481,520
391654	INTERSTATE TELECOMM.	C	43,435,977	40,805,419	37,378,310	34,505,404	28,471,805
391657	ALLIANCE-SPLITROCK	C	40,407,752	98,788,402	328,511,400	132,991,813	13,084,806
391659	GOLDEN WEST TELECOM	C	53,256,116	49,186,092	42,340,037	38,512,430	33,542,282
391660	FT RANDALL-MT RUSHMR	A	16,368,336	15,917,835	15,057,736	14,453,466	13,123,771
391664	JAMES VALLEY COOP	A	12,831,519	12,761,598	11,412,131	11,674,064	10,585,582
391666	JEFFERSON TEL CO -SD	C	5,558,961	4,714,817	1,947,488	1,475,864	1,114,281
391667	GOLDEN WEST-KADOKA	C	1,326,512	1,285,222	1,105,885	912,760	726,708
391668	KENNEBEC TEL CO	C	1,750,231	1,803,247	1,512,557	1,437,037	1,123,912
391669	TRIOTEL COMM-MCCOOK	A	5,309,834	5,315,225	3,954,750	4,451,504	3,714,209
391670	MIDSTATE COMM., INC.	C	8,704,422	10,419,523	9,454,917	9,064,935	7,520,958
391671	WEST RIVER(MOBRIDGE)	A	8,044,413	7,748,936	7,080,783	7,117,048	6,447,425
391674	ROBERTS COUNTY COOP	C	7,563,637	7,768,831	7,269,742	7,532,232	7,473,461
391676	SANTEL COMM. COOP.	C	11,766,799	10,698,683	9,839,776	9,201,164	7,827,233
391677	GOLDEN WEST-SIOUX VY	A	14,670,600	11,237,921	9,749,434	8,266,043	6,749,647
391679	STOCKHOLM-STRANDBURG	C	2,321,465	2,181,343	1,816,785	1,740,897	1,560,738
391680	VENTURE COMM. COOP	C	36,253,902	35,764,947	35,606,642	32,805,862	28,053,652
391682	TRIOTEL COMM(TRI-C)	A	1,053,008	1,174,520	962,991	915,935	801,225
391684	GOLDEN WEST-UNION	A	18,440,422	3,238,184	2,882,159	2,760,587	2,326,392
391685	VALLEY TELECOMM.	C	10,807,296	11,050,495	9,783,411	9,547,185	8,844,295
391686	GOLDEN WEST-VIVIAN	C	59,246,595	51,038,302	46,375,548	44,096,204	37,599,864
391688	WESTERN TEL CO.	A	2,515,849	2,546,626	2,336,138	2,486,915	2,004,689
391689	WEST RIVER COOP	C	14,524,671	13,508,485	12,327,183	11,776,900	10,456,822
395145	QWEST CORP-SD	1	531,333,115	491,479,914	434,188,766	378,440,946	338,472,525
	TENNESSEE - TOTAL		7,874,139,183	7,652,105,582	7,075,383,760	6,452,823,175	5,613,882,586
290280	ARDMORE TEL CO	C	30,868,473	29,815,030	27,190,655	25,001,705	19,973,792
290552	CENTURYTEL-ADAMSVILL	2	N/A	N/A	N/A	N/A	8,064,718
290552	CENTURYTEL-ADAMSVILL	C	22,677,557	20,771,716	19,259,808	18,628,449	8,531,323
290553	BEN LOMAND RURAL	A	84,518,040	78,524,075	73,900,771	71,354,863	64,309,482
290554	BLEDSE TEL COOP	A	30,005,715	30,072,562	28,340,236	25,902,292	23,761,842
290557	CENTURY-CLAIBORNE	2	N/A	N/A	N/A	N/A	11,689,222
290557	CENTURY-CLAIBORNE	C	32,761,776	32,254,788	27,329,774	26,719,690	12,403,749
290559	CONCORD TEL EXCHANGE	C	104,332,537	105,929,451	77,463,577	71,197,640	64,752,699
290561	CROCKETT TEL CO	C	8,046,596	7,056,591	7,113,909	6,033,637	5,406,391
290562	DEKALB TEL COOP	C	58,730,527	57,264,255	46,957,989	39,840,537	35,665,253
290565	HIGHLAND TEL COOP-TN	A	60,493,874	60,139,496	60,727,176	54,266,322	49,851,796
290566	HUMPHREY'S COUNTY	C	4,748,338	4,981,679	4,390,099	4,533,184	4,055,152
290567	UNITED SOUTHEAST-TN	1	631,363,216	631,153,723	656,618,166	547,034,003	453,779,472
290570	LORETTO TEL CO	A	16,492,910	15,618,875	13,906,437	12,938,817	12,101,059
290571	MILLINGTON TEL CO	C	68,934,279	62,781,014	59,061,106	54,235,250	51,197,883
290573	NORTH CENTRAL COOP	C	68,805,651	65,850,689	60,098,658	55,537,719	55,776,095
290574	CENTURYTEL-OOLTEWAH	2	N/A	N/A	N/A	N/A	8,856,961
290574	CENTURYTEL-OOLTEWAH	C	30,452,024	28,231,372	27,141,488	23,251,845	9,649,228
290575	TENNESSEE TEL CO	C	171,984,851	181,952,877	173,166,429	159,372,885	138,394,408
290576	PEOPLES TEL CO	C	12,255,938	12,231,126	12,434,074	11,834,833	10,426,258
290578	TELLICO TEL CO	C	23,645,501	26,566,517	25,795,754	25,579,689	23,814,358
290579	TWIN LAKES TEL COOP	C	97,083,522	94,361,175	87,603,782	83,332,812	78,020,440
290580	CTZENS-FRNRTR-VOL ST	2	82,112,100	75,591,426	48,841,076	40,054,641	35,965,009
290581	UTC OF TN	C	44,909,473	43,336,473	42,526,990	38,610,613	32,669,407
290583	WEST TENNESSEE TEL	C	9,124,251	7,331,038	7,163,590	6,509,819	5,276,997
290598	WEST KY COOP-TN	A	5,773,444	5,028,410	4,090,047	3,315,823	3,041,610
294336	CITIZENS-FRONTIER-TN	2	212,133,394	201,081,473	193,049,418	178,905,353	152,437,112
295185	SO. CENTRAL BELL -TN	1	5,961,885,196	5,774,179,751	5,291,212,751	4,868,830,754	4,234,010,870
	TEXAS - TOTAL		24,148,249,713	23,427,042,916	21,984,874,399	20,183,769,986	17,602,128,730
440425	CAMERON TEL CO TEXAS	C	1,694,508	1,511,524	1,209,849	980,506	552,775
441163	WINDSTREAM SW-TX#1	2	629,294,761	587,222,865	568,828,644	502,755,904	438,215,083
442038	BLOSSOM TEL CO	C	7,523,880	9,941,179	5,181,530	2,212,542	1,615,114
442039	BIG BEND TEL CO INC	C	14,258,189	13,263,764	12,608,927	11,795,669	9,264,350
442040	BRAZORIA TEL CO	C	11,658,370	10,855,999	10,844,177	9,892,763	6,896,460

Table 8.3
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Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
442041	BRAZOS TEL COOP INC	C	9,798,245	9,947,356	9,063,130	8,468,233	6,808,845
442043	NORTH TEXAS TEL. CO.	A	1,454,750	1,316,453	1,039,684	840,322	740,890
442046	CAP ROCK TEL COOP	C	9,386,507	9,111,081	8,533,458	6,813,944	4,953,995
442052	CENTRAL TEXAS CO-OP	C	11,838,684	11,806,515	11,254,723	9,597,371	7,983,516
442057	COLEMAN COUNTY CO-OP	C	3,898,393	3,601,641	2,789,197	2,064,826	1,734,571
442059	COLORADO VALLEY TEL	C	9,763,710	9,068,483	8,114,397	8,039,147	6,940,462
442060	TOTELCOM COMM.	C	10,695,572	10,039,207	8,957,321	8,853,247	8,025,610
442061	COMMUNITY TEL CO	C	2,857,090	2,507,324	2,155,401	2,077,090	1,656,391
442065	CUMBY TEL COOP INC	C	1,518,950	1,624,259	1,483,563	1,271,332	955,724
442066	DELL TEL. CO-OP - TX	C	2,360,227	2,200,313	1,920,889	1,501,165	1,666,321
442068	EASTEX TEL COOP INC	C	64,022,569	58,464,384	52,833,274	47,712,425	38,255,893
442069	ELECTRA TELEPHONE CO	C	2,677,957	2,286,227	2,051,252	1,816,126	1,492,375
442070	ETEX TEL COOP INC	C	27,712,432	26,391,701	23,450,984	19,530,962	25,093,675
442071	FIVE AREA TEL CO-OP	C	15,583,686	14,522,761	13,045,584	10,510,821	7,856,784
442072	CONSOLIDATED FT BEND	2	N/A	N/A	N/A	38,775,744	64,893,939
442072	CONSOLIDATED FT BEND	C	91,474,288	87,139,602	85,682,141	42,106,990	N/A
442073	BORDER TO BORDER	C	86,584	83,091	74,972	64,353	61,097
442076	GANADO TELEPHONE CO	C	4,879,554	4,449,738	4,051,822	3,080,112	2,570,610
442080	GTE SW VERIZON-TX	1	3,327,106,856	3,114,764,483	2,848,013,563	2,622,791,835	2,312,110,332
442083	GUADALUPE VALLEY TEL	C	83,578,688	82,002,232	83,438,717	75,648,687	64,184,910
442084	UTC OF TEXAS INC	2	350,858,626	323,503,459	291,960,141	254,932,741	220,196,210
442086	HILL COUNTRY CO-OP	C	37,660,889	35,647,557	31,940,418	24,808,475	22,918,153
442090	ALENCO COMMUNICATION	C	4,556,600	3,939,988	3,033,110	2,223,006	1,840,051
442091	ETS TEL. CO., INC.	C	25,076,128	29,540,831	34,437,095	37,701,169	34,739,565
442093	INDUSTRY TEL CO	C	3,466,292	3,218,119	2,614,754	2,308,430	2,113,133
442097	WINDSTREAM KERRVILLE	2	N/A	N/A	N/A	19,516,436	37,524,189
442097	WINDSTREAM KERRVILLE	C	61,389,916	48,197,498	43,502,809	20,421,694	N/A
442101	CENTURYTEL-LK DALLAS	2	N/A	N/A	N/A	N/A	9,281,341
442101	CENTURYTEL-LK DALLAS	C	32,398,123	30,144,890	28,729,687	23,550,762	10,024,097
442103	LA WARD TEL EXCHANGE	C	1,972,856	1,848,783	1,530,875	1,120,959	927,497
442104	LAKE LIVINGSTON TEL	C	2,316,010	2,302,805	2,063,050	1,744,864	1,368,261
442105	LIPAN TEL CO	C	2,730,946	2,631,824	2,424,230	1,944,707	1,520,495
442107	LIVINGSTON TEL CO	A	21,649,192	17,622,514	15,849,486	13,898,950	11,630,397
442109	CONSOLIDATED COMM-TX	2	N/A	N/A	N/A	93,434,501	167,132,149
442109	CONSOLIDATED COMM-TX	C	246,567,829	229,155,364	213,542,681	99,207,412	N/A
442112	MID-PLAINS RURAL TEL	C	5,804,147	5,163,691	4,550,247	3,951,846	3,437,865
442114	CENDEL OF TEXAS	2	619,876,364	504,132,730	440,508,015	383,268,239	339,250,184
442116	MUENSTER DBA NORTEX	C	8,912,097	6,600,742	6,029,178	5,905,916	5,227,940
442117	CENTURYTEL-PORT ARAN	2	N/A	N/A	N/A	N/A	1,788,117
442117	CENTURYTEL-PORT ARAN	C	8,169,243	6,803,619	6,134,868	5,337,778	2,554,746
442130	PEOPLES TEL COOP -TX	C	35,489,819	32,194,005	28,293,041	25,286,959	21,815,449
442131	POKA-LAMBRO TEL COOP	C	5,037,996	4,529,302	3,561,178	5,084,556	3,896,103
442134	RIVIERA TEL CO INC	C	1,602,540	1,476,512	1,282,952	1,293,613	936,544
442135	SOUTHWEST TEXAS TEL	C	7,162,717	6,419,691	5,884,612	5,058,182	4,266,384
442140	CENTURYTEL-SAN MARCO	2	N/A	N/A	N/A	N/A	13,279,191
442140	CENTURYTEL-SAN MARCO	C	51,909,160	46,754,160	38,420,470	31,022,521	13,709,867
442141	SANTA ROSA TEL COOP	C	5,945,981	5,873,106	6,727,936	3,863,361	3,506,817
442143	SOUTH PLAINS TEL	C	8,334,837	7,890,944	6,925,423	5,869,210	4,935,390
442147	WINDSTREAM SUGARLAND	2	N/A	N/A	N/A	80,286,753	140,031,035
442147	WINDSTREAM SUGARLAND	C	207,508,703	190,022,880	178,685,726	80,119,133	N/A
442150	TATUM TEL CO	C	1,932,098	1,753,555	1,625,433	1,455,932	1,143,427
442151	TAYLOR TEL CO-OP INC	C	11,858,886	11,106,261	9,528,992	7,891,169	6,498,484
442153	TEXAS WINDSTREAM	2	N/A	N/A	N/A	22,661,478	41,283,052
442153	TEXAS WINDSTREAM	C	59,887,620	53,481,311	50,764,950	23,478,997	N/A
442154	GTE-SW VERIZON-TX	1	215,174,753	213,813,024	200,727,100	186,336,235	156,991,242
442159	VALLEY TEL CO-OP -TX	C	9,587,672	8,478,425	7,271,333	6,209,796	4,809,314
442166	WEST TEXAS RURAL TEL	C	5,452,995	5,166,176	4,819,687	4,353,930	3,876,470
442168	WES-TEX TEL CO-OP	C	4,727,208	4,066,421	3,704,266	3,433,324	2,599,807
442170	XIT RURAL TEL CO-OP	C	4,894,707	4,475,695	4,427,012	4,422,351	3,927,034
442262	ENMR TEL COOP-TX	C	2,443,295	2,180,415	1,780,132	1,818,487	1,547,691

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445216	SOUTHWESTERN BELL-TX	1	17,730,769,018	17,502,784,437	16,534,966,313	15,249,343,998	13,285,071,317
	UTAH - TOTAL		3,001,450,378	2,848,070,265	2,548,300,778	2,323,130,025	1,914,486,540
500758	DIRECTCOMM-CEDAR VAL	C	N/A	7,513,856	7,070,268	5,309,008	3,152,399
502277	CENTRAL UTAH TEL INC	C	10,325,050	10,664,287	9,720,557	8,562,755	7,858,640
502278	EMRY dba EMRY TELCOM	C	42,400,197	41,267,070	35,325,102	19,442,063	17,602,770
502279	GUNNISON TEL CO	A	5,063,588	4,773,374	5,063,544	4,145,850	3,590,326
502282	MANTI TEL CO	A	8,367,051	6,697,948	7,269,703	5,332,510	5,135,558
502283	SKYLINE TELECOM	A	9,522,698	9,305,523	8,423,896	6,659,997	4,966,673
502284	BEEHIVE TEL CO - UT	C	150,391,591	173,479,804	146,569,032	109,581,556	3,904,587
502286	SOUTH CENTRAL UTAH	C	48,280,861	45,459,638	40,432,248	35,181,191	33,141,869
502287	UBTA-UBET/STRATA	C	56,152,150	54,558,813	50,080,275	44,302,406	36,778,321
502288	ALL WEST COMM-UT	C	15,140,350	15,628,985	15,410,022	17,048,105	12,068,364
503032	BEAR LAKE COMM	C	1,975,203	1,692,754	1,558,950	1,168,307	1,069,291
504429	CITIZENS-FRONTIER-UT	2	80,411,638	70,884,476	62,944,522	58,671,997	50,764,292
504449	NAVAJO-UT-FRONTIER	2	4,223,497	4,265,075	4,390,379	4,083,680	3,488,659
505107	QWEST CORP-UT	1	2,569,196,504	2,401,878,662	2,154,042,280	2,003,640,600	1,730,964,791
	VERMONT - TOTAL		1,355,478,433	1,283,117,810	1,167,430,579	1,027,572,768	959,690,345
140053	FRANKLIN TEL CO - VT	A	2,557,875	2,515,488	1,997,473	1,593,837	1,633,664
140058	LUDLOW TEL CO	C	12,716,201	11,995,695	12,050,574	11,832,519	9,593,217
140061	NORTHFIELD TEL CO	C	13,467,357	12,789,651	11,934,608	11,010,665	9,332,267
140062	PERKINSVILLE TEL CO	C	3,816,720	3,870,459	3,709,526	3,503,854	3,451,089
140064	SHOREHAM TEL CO INC.	A	13,248,247	13,007,796	11,630,772	9,886,164	10,759,836
140068	TOPSHAM TEL CO	C	8,711,954	7,568,826	7,202,521	5,910,920	5,726,436
140069	WAITSFIELD/FAYSTON	C	79,008,404	75,080,821	71,073,999	67,780,467	61,058,416
143331	FAIRPOINT-VT	C	23,671,227	22,413,907	20,178,082	16,512,166	16,419,643
145115	TEL OP -FAIRPOINT-VT	1	1,118,185,845	1,059,176,894	953,722,385	827,361,221	774,300,956
147332	VERMONT TEL. CO-VT	C	80,094,603	74,698,273	73,930,639	72,180,955	67,414,821
	VIRGIN ISLANDS - TOTAL		462,826,538	478,213,416	378,655,431	372,199,452	353,810,241
643300	VITELCO-INNOVATIVE	C	462,826,538	478,213,416	378,655,431	372,199,452	353,810,241
	VIRGINIA - TOTAL		12,118,180,462	11,346,562,675	10,456,170,250	9,559,980,164	9,110,364,282
190217	AMELIA TEL CORP	C	11,628,824	13,975,600	13,583,407	14,094,334	13,019,365
190219	BUGGS ISLAND COOP	C	15,422,068	15,596,351	13,470,081	14,116,350	12,414,644
190220	BURKE'S GARDEN TEL	A	611,709	598,010	604,972	586,278	528,666
190225	CITIZENS TEL COOP	A	31,983,078	31,959,326	29,085,424	27,130,460	24,284,258
190226	NTELOS, INC.	A	87,926,281	82,204,370	75,762,651	74,061,415	68,514,251
190233	VERIZON S-VA(CONTEL)	1	1,997,832,396	1,829,544,479	1,644,161,649	1,448,456,672	1,328,653,338
190237	HIGHLAND TEL COOP	A	4,254,223	4,147,413	3,847,263	3,471,393	3,427,320
190238	MGW TEL. CO. INC.	A	5,077,698	4,979,719	4,263,090	4,692,495	4,658,353
190239	NEW HOPE TEL COOP	A	2,315,524	1,975,798	1,453,836	1,333,630	1,141,728
190243	PEMBROKE TEL COOP	A	7,334,861	6,965,524	5,680,714	5,408,321	4,916,196
190244	PEOPLES MUTUAL TEL	C	18,390,504	17,080,672	15,967,181	14,875,113	12,489,400
190248	SCOTT COUNTY COOP	C	31,161,369	30,529,775	30,920,623	29,289,371	26,489,191
190249	ROANOKE & BOTETOURT	C	28,143,191	26,382,235	25,228,976	24,406,638	20,189,518
190250	SHENANDOAH TEL CO	A	83,567,819	93,052,093	100,711,226	107,460,827	99,150,714
190253	VIRGINIA TEL CO	A	27,592,712	34,866,235	19,552,516	5,932,264	5,075,950
190254	CENDEL OF VIRGINIA	2	923,644,354	889,933,200	853,755,925	804,268,343	719,205,302
190479	VERIZON SOUTH-VA	1	139,609,116	147,316,852	146,303,789	143,014,652	137,543,875
190567	UNITED SOUTHEAST-VA	1	318,953,060	328,666,098	323,782,888	307,633,824	273,711,101
193029	NEW CASTLE TEL. CO.	C	4,711,736	5,158,844	4,970,314	4,997,687	4,499,362
195040	VERIZON VIRGINIA INC	1	8,375,416,239	7,779,159,968	7,141,201,596	6,522,907,566	6,348,763,975
197251	SHENANDOAH - NR	A	2,603,700	2,470,113	1,862,129	1,842,531	1,687,775
	WASHINGTON - TOTAL		8,725,271,523	7,853,824,075	6,904,608,865	6,174,867,901	5,301,665,731
520580	WESTGATE dba WEAUTEL	C	N/A	N/A	139	11,471	15,604
520581	BEAVER CREEK TIMBRLN	C	N/A	10,752	43,252	39,195	28,938
521402	M&L ENT. dba SKYLINE	C	52,550	60,112	55,904	55,040	58,800
522400	UTC OF THE NW-WA	2	243,922,673	223,947,654	196,444,055	175,487,797	152,224,371
522404	ASOTIN TEL - WA	C	4,499,616	4,519,601	3,899,749	3,549,053	3,370,282
522408	CENTURYTEL-WASHINGTO	2	N/A	N/A	N/A	N/A	149,468,115
522408	CENTURYTEL-WASHINGTO	C	475,831,560	432,102,639	385,094,111	353,205,134	161,254,255
522410	CENTURYTEL-COWICHE	2	N/A	N/A	N/A	N/A	1,900,008

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522410	CENTURYTEL-COWICHE	C	5,369,235	4,959,015	4,438,090	4,305,161	2,037,375
522412	ELLENSBURG TEL CO	C	53,866,775	46,485,146	42,105,371	39,543,973	36,055,543
522416	VERIZON N'WEST-WA	1	1,842,244,442	1,627,738,408	1,476,335,595	1,312,529,404	1,163,411,562
522417	HAT ISLAND TEL CO	C	145,503	149,687	127,411	95,155	55,088
522418	PEND OREILLE TEL.	C	7,311,291	7,160,964	6,819,354	4,883,059	4,119,492
522419	HOOD CANAL TEL CO	C	3,400,431	2,931,547	2,781,629	2,759,928	2,239,724
522423	INLAND TEL CO -WA	C	8,186,248	7,350,198	8,088,131	8,117,773	7,724,345
522426	KALAMA TEL CO	C	8,983,630	8,835,674	8,707,907	7,594,953	6,038,822
522427	LEWIS RIVER TEL CO	C	22,934,251	21,394,711	20,986,743	19,435,376	18,088,671
522430	MCDANIEL TEL CO	A	23,360,220	20,927,010	10,723,278	11,025,147	10,626,301
522431	MASHELL TELECOM INC	C	7,772,627	7,444,166	7,164,142	7,141,136	5,852,929
522437	PIONEER TEL CO	C	2,706,683	2,439,392	2,232,743	1,932,521	1,626,949
522442	ST JOHN TEL CO	C	1,714,809	1,714,346	1,515,044	1,397,093	1,245,400
522446	TENINO TELEPHONE CO	C	9,570,039	9,050,771	8,306,080	6,963,760	5,955,638
522447	TOLEDO TELEPHONE CO	C	5,263,558	4,851,084	4,197,588	3,980,977	3,383,685
522449	VERIZON N'WEST-WA	1	214,909,126	208,688,502	196,392,653	182,388,383	152,413,173
522451	WESTERN WAHKIAKUM	C	4,397,435	4,213,128	3,685,969	3,594,924	3,395,966
522452	WHIDBEY TEL CO.	C	41,699,989	40,124,714	36,666,093	35,177,660	31,472,184
522453	YCOM NETWORKS, INC.	C	34,022,789	34,556,689	32,361,020	27,928,076	23,626,725
525161	QWEST CORP-WA	1	5,703,106,043	5,132,168,165	4,445,436,814	3,961,725,752	3,353,975,786
	WEST VIRGINIA - TOTAL		3,241,365,448	3,077,738,000	2,903,020,006	2,760,449,822	2,490,089,216
200256	ARMSTRONG OF WV	C	8,080,900	8,505,541	8,409,730	9,341,336	8,988,856
200257	SPRUCE KNOB SENECA	C	3,600,836	3,503,153	3,388,601	3,643,485	3,517,785
200258	WAR ACQ. DBA WAR TEL	A	9,473,335	9,236,761	8,550,901	9,142,967	9,565,369
200259	HARDY TELECOM	C	13,215,859	13,522,060	13,496,977	12,992,410	12,203,960
200267	ARMSTRONG TEL. CO.	C	12,572,979	11,965,614	12,321,048	13,491,605	13,464,275
200271	CITIZENS-FRONTIER-WV	2	91,158,234	92,250,991	92,138,159	96,400,469	91,202,125
200277	WEST SIDE TEL-WV	C	8,706,629	7,934,984	7,976,964	7,444,880	6,959,653
204338	CITIZENS-FRONTIER-WV	2	124,396,176	124,311,661	125,529,241	130,751,704	125,876,056
204339	CITIZENS-FRONTIER-WV	2	388,124,789	366,620,497	354,392,945	348,070,659	323,024,371
205050	VERIZON W VA INC.	1	2,582,035,711	2,439,886,738	2,276,815,440	2,129,170,307	1,895,286,766
	WISCONSIN - TOTAL		6,892,244,830	6,295,473,712	5,661,549,860	5,406,143,578	4,752,165,077
330841	CENTURYTEL-MW-WI	2	N/A	N/A	N/A	N/A	21,465,367
330841	CENTURYTEL-MW-WI	C	70,430,673	65,488,162	54,383,557	51,269,981	22,928,717
330842	AMERY TELCOM, INC.	A	22,342,193	19,795,903	16,212,212	15,080,860	13,216,330
330843	AMHERST TEL CO	A	10,823,803	9,887,327	8,278,748	7,676,299	6,906,560
330844	BADGER TELECOM, INC.	C	13,641,356	15,098,661	12,434,487	11,044,088	9,951,296
330846	BALDWIN TELECOM	A	17,050,689	15,160,778	12,766,472	12,353,308	10,685,561
330847	BELMONT TEL CO	A	1,811,798	1,643,467	1,525,304	1,404,316	1,184,228
330848	BERGEN TEL CO	A	860,748	910,910	569,995	483,068	401,487
330849	BLACK EARTH TEL CO	A	2,529,459	2,582,570	2,395,022	2,213,304	1,911,580
330850	BLOOMER TEL CO	C	6,789,973	6,067,097	5,136,253	5,226,125	4,244,319
330851	BONDUEL TEL CO	A	2,720,041	3,090,716	2,848,805	3,077,714	2,611,386
330855	BRUCE TEL CO, INC	C	4,906,663	4,878,943	4,053,684	3,696,828	3,119,062
330856	BURLINGTON B&W	A	10,932,410	10,869,688	10,382,547	9,541,565	7,670,973
330857	CENTURYTEL-MW-WI	2	N/A	N/A	N/A	N/A	718,539
330857	CENTURYTEL-MW-WI	C	2,099,405	2,022,206	1,661,733	1,599,188	812,736
330859	CENTRAL STATE TEL CO	C	18,458,652	19,907,369	19,006,141	19,678,424	17,277,445
330860	CHEQUAMEGON COM COOP	C	30,597,585	30,004,372	28,393,201	33,653,253	31,810,535
330861	CHIBARDUN TEL COOP	C	16,184,108	15,330,709	13,849,633	13,236,355	11,932,202
330863	CITIZENS TEL COOP-WI	C	5,751,688	5,065,250	4,282,120	4,086,812	3,732,133
330865	CLEAR LAKE TEL CO-WI	A	4,950,783	4,736,487	4,010,777	3,857,703	3,326,245
330866	COCHRANE COOP TEL CO	C	4,211,604	3,463,161	3,292,533	3,319,490	2,912,308
330868	COON VALLEY FARMERS	A	5,203,983	5,017,834	4,172,846	4,097,003	3,653,696
330870	RHINELANDER-FRONTIER	2	7,192,607	6,402,390	6,031,550	5,540,426	5,186,947
330872	CUBA CITY EXCHANGE	A	4,651,146	4,373,816	4,013,726	3,787,506	3,271,041
330875	DICKEYVILLE TEL CORP	A	2,666,288	2,748,056	2,625,816	2,647,391	2,592,626
330877	CENTURYTEL-FAIRWATER	2	N/A	N/A	N/A	N/A	799,157
330877	CENTURYTEL-FAIRWATER	C	2,432,001	2,139,742	1,934,021	1,798,080	870,506
330879	FARMERS INDEPENDENT	A	11,448,761	10,204,375	9,102,625	8,974,471	7,696,819

Table 8.3
Total ILEC Interstate Access Minutes by Study Area

Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
330880	FARMERS TEL CO - WI	A	13,548,551	13,591,358	12,356,695	12,382,216	11,723,480
330881	MID-PLAINS TEL CO	A	122,486,451	139,503,085	150,467,855	154,884,272	152,889,441
330884	CENTURYTEL-FORESTVIL	2	N/A	N/A	N/A	N/A	1,246,284
330884	CENTURYTEL-FORESTVIL	C	4,175,052	3,559,407	2,965,814	3,047,860	1,299,271
330886	VERIZON NORTH-WI	1	883,816,094	781,092,891	654,698,392	616,517,439	517,976,488
330889	HAGER TELECOM INC.	A	7,114,016	6,185,759	5,423,140	5,404,416	4,604,711
330891	RHINELANDER-FRONTIER	2	12,319,758	11,040,430	9,460,778	8,709,957	7,983,429
330892	HILLSBORO TEL CO	A	3,727,235	3,564,959	3,101,031	2,908,665	2,478,815
330895	CENTURYTEL-WISCONSIN	2	N/A	N/A	N/A	N/A	63,171,011
330895	CENTURYTEL-WISCONSIN	C	160,941,788	148,492,320	136,752,889	132,606,279	63,013,634
330896	LAKEFIELD TEL CO	A	3,730,829	3,255,717	3,052,682	3,053,992	2,825,317
330898	CENTURYTEL LARSEN	2	N/A	N/A	N/A	N/A	1,387,855
330898	CENTURYTEL LARSEN	C	5,335,762	4,580,537	3,898,877	3,679,146	1,535,893
330899	LA VALLE TEL COOP	C	4,387,857	3,979,141	3,433,025	3,262,703	2,824,085
330900	LEMONWEIR VALLEY TEL	C	7,188,845	6,482,610	5,624,150	5,346,286	5,019,561
330902	LUCK TEL CO	A	8,335,042	7,157,735	6,152,227	5,966,747	5,125,763
330905	MANAWA TEL CO	A	4,839,453	4,507,652	3,801,055	3,678,533	3,073,624
330908	MARQUETTE-ADAMS COOP	C	9,191,737	8,696,345	7,702,868	7,118,236	6,229,644
330909	MIDWAY TEL CO	C	18,159,955	18,305,938	15,666,876	17,669,961	16,114,424
330910	MILLTOWN MUTUAL TEL	C	7,757,729	6,817,542	5,826,128	5,649,823	4,886,013
330912	FRONTIER-MONDOVI	2	6,602,205	6,160,749	5,271,869	5,370,983	5,027,290
330913	CENTURYTEL MONROE	2	N/A	N/A	N/A	N/A	12,857,275
330913	CENTURYTEL MONROE	C	42,079,132	39,876,180	34,885,989	30,845,296	13,370,502
330914	EASTCOAST TELECOM	A	9,828,212	9,704,726	8,510,671	8,068,319	7,299,233
330915	MOSINEE TEL CO LLC	A	13,309,372	11,573,615	10,350,717	9,979,215	9,464,296
330916	MOUNT HOREB TEL CO	C	9,623,052	8,947,296	7,708,811	6,527,621	5,597,925
330917	MT VERNON TEL CO	C	30,410,553	30,550,408	25,377,089	25,548,315	23,298,235
330918	NELSON TEL COOP	C	11,545,009	9,406,704	8,804,753	8,892,831	8,151,910
330920	NIAGARA TEL CO	C	14,905,013	15,869,751	14,499,262	13,362,561	9,818,421
330922	CENTURYTEL-MW-WI/NW	2	N/A	N/A	N/A	N/A	54,454,214
330922	CENTURYTEL-MW-WI/NW	C	190,776,902	165,497,836	142,920,834	130,304,645	57,904,964
330924	CENTURYTEL-MW-KENDAL	2	N/A	N/A	N/A	N/A	67,967,614
330924	CENTURYTEL-MW-KENDAL	C	216,955,822	195,907,156	171,524,508	161,399,009	72,019,292
330925	BAYLAND TEL, LLC	A	4,705,399	4,482,811	4,091,119	4,259,452	3,422,433
330930	GRANTLAND TELECOM	A	7,864,246	7,978,669	7,110,864	7,220,247	7,019,790
330931	CENTURYTEL-SO WI	2	N/A	N/A	N/A	N/A	4,696,692
330931	CENTURYTEL-SO WI	C	14,773,374	12,567,852	11,191,490	10,635,454	4,726,377
330934	CENTURYTEL-MW-WI	2	N/A	N/A	N/A	N/A	7,631,071
330934	CENTURYTEL-MW-WI	C	21,112,646	19,517,758	16,576,343	14,172,570	6,950,658
330936	INDIANHEAD TEL CO	C	7,009,476	6,492,324	5,538,957	5,045,342	4,448,475
330937	PRICE COUNTY TEL CO	C	13,110,634	11,503,051	9,982,309	10,923,929	8,623,590
330938	NORTHEAST TEL CO	A	20,670,790	20,881,916	20,673,485	23,337,953	22,529,599
330940	RHINELANDER-FRONTIER	2	33,948,961	30,307,975	26,110,016	25,274,992	25,087,333
330941	RHINELANDER-FRONTIER	2	3,391,570	3,157,173	2,729,160	2,514,965	2,274,386
330942	RICHLAND-GRANT COOP	C	8,587,724	8,007,779	6,731,736	6,239,278	5,924,279
330943	RIVERSIDE TELECOM	A	6,707,729	5,982,123	5,609,736	5,668,892	4,943,084
330944	FRONTIER-ST.CROIX	A	33,775,806	30,073,532	27,800,103	28,046,155	23,942,599
330945	SCANDINAVIA TEL CO	A	5,721,378	5,264,172	4,464,040	4,505,305	3,955,863
330946	SHARON TEL CO	A	4,972,460	4,583,271	3,562,747	3,259,597	2,858,718
330949	SIREN TEL CO, INC	C	7,521,959	6,708,623	5,576,924	4,961,098	4,529,306
330950	CENTURYTEL-NW WI	2	N/A	N/A	N/A	N/A	27,053,917
330950	CENTURYTEL-NW WI	C	75,254,590	68,471,495	61,127,314	61,084,505	27,767,726
330951	SOMERSET TEL CO	A	12,600,829	11,170,342	9,798,347	8,894,262	7,654,707
330952	SE TEL OF WISCONSIN	C	19,299,913	19,390,038	17,698,521	16,842,871	13,591,093
330953	SPRING VALLEY TEL CO	C	3,978,397	3,587,449	3,262,220	3,069,522	2,502,059
330954	STOCKBRIDGE & SHERWD	C	5,209,491	5,580,229	4,589,643	4,451,991	3,482,617
330955	STATE LONG DISTANCE	A	26,963,063	24,560,847	22,245,675	21,047,345	18,593,299
330956	CENTURYTEL-NORTH WI	2	N/A	N/A	N/A	N/A	13,376,062
330956	CENTURYTEL-NORTH WI	C	38,780,182	33,736,370	28,507,526	27,985,841	12,288,876
330958	TENNEY TEL CO	C	3,364,200	3,379,520	2,904,912	2,879,218	2,806,115

Table 8.3
Total ILEC Interstate Access Minutes by Study Area

Study Area ID Code	Study Area Name	Type	2005	2006	2007	2008	2009
330959	CENTURYTEL-MW-WI	2	N/A	N/A	N/A	N/A	2,287,782
330959	CENTURYTEL-MW-WI	C	5,986,543	5,817,413	5,096,449	5,061,281	2,428,014
330960	TRI-COUNTY COMM COOP	C	10,130,331	9,276,301	7,909,953	8,105,577	7,264,366
330962	UNION TEL CO	C	10,738,522	9,473,642	8,169,520	8,013,454	7,442,277
330963	UTELCO, INC	C	58,587,800	60,215,484	52,487,950	50,817,547	48,617,320
330964	FRONTIER-WISCONSIN	2	53,241,808	49,791,929	39,903,627	38,299,781	33,081,136
330966	VERNON TEL COOP	A	21,087,596	17,482,126	15,222,993	14,698,109	12,929,477
330967	FRONTIER OF VIROQUA	A	9,113,976	8,511,536	7,763,312	8,199,519	6,735,360
330968	WAUNAKEE TEL CO	A	15,512,619	15,110,376	12,694,160	12,697,294	11,131,605
330970	CENTURYTEL-MW-WI	A	15,491,754	13,962,873	12,631,658	11,634,803	10,611,614
330971	W. WISCONSIN TELCOM	C	19,796,034	18,835,049	18,648,663	20,411,152	18,679,635
330973	WITTENBERG TEL CO	C	5,330,776	5,553,515	4,586,590	4,208,650	4,015,097
330974	WOOD COUNTY TEL CO	C	68,986,176	57,241,919	48,653,050	43,009,177	43,743,171
331155	TELEPHONE USA OF WI	2	N/A	N/A	N/A	N/A	56,987,682
331155	TELEPHONE USA OF WI	C	165,959,139	148,282,315	136,451,622	131,679,932	57,890,081
331159	CENTURYTEL-CENTRL WI	2	N/A	N/A	N/A	N/A	48,228,136
331159	CENTURYTEL-CENTRL WI	C	150,191,015	134,402,645	119,684,637	113,919,138	51,240,520
335220	WISCONSIN BELL	1	3,798,986,081	3,462,933,434	3,170,159,696	3,011,538,496	2,630,641,365
	WYOMING - TOTAL		1,077,302,068	997,321,375	874,771,334	746,130,603	618,293,262
511595	UTC OF THE WEST-WY	2	29,652,289	26,645,311	24,782,313	22,711,909	20,125,210
512251	RANGE TEL COOP - WY	C	71,088,532	68,966,808	64,120,616	61,782,840	53,049,965
512289	CHUGWATER TEL CO	C	1,055,300	937,506	709,924	574,148	433,608
512290	ALL WEST COMM.-WY	C	1,785,738	1,961,262	1,500,035	1,664,451	1,255,046
512291	DUBOIS TEL EXCHANGE	C	10,672,726	10,620,070	10,326,489	10,287,665	8,948,972
512295	SILVER STAR TEL-WY	C	15,056,388	15,908,299	16,081,538	13,124,408	10,400,578
512296	TRI COUNTY TEL ASSN	C	26,732,896	21,407,793	18,824,953	14,602,418	12,153,779
512297	UNION TELEPHONE CO	C	75,781,413	91,298,483	63,198,796	26,153,907	21,795,739
512299	CENTURYTEL OF WY.	2	N/A	N/A	N/A	N/A	9,425,772
512299	CENTURYTEL OF WY.	C	24,602,677	25,355,784	23,420,918	21,618,188	9,833,490
515108	QWEST CORP-WY	1	820,874,109	734,220,059	651,805,752	573,610,669	470,871,103
	Total Tier 1 Companies		356,991,882,318	336,985,815,296	310,170,948,774	281,248,158,051	247,310,891,596
	Total Tier 2 Cost Companies		38,492,827,599	36,419,195,827	33,307,472,271	29,945,627,189	26,043,424,116
	Total Cost Companies		395,484,709,917	373,405,011,123	343,478,421,045	311,193,785,240	273,354,315,712
	Total Average Schedule Companies		5,460,619,013	5,805,996,737	5,382,565,945	4,454,420,922	4,032,586,889
	GRAND TOTAL		400,945,328,930	379,211,007,860	348,860,986,990	315,648,206,162	277,386,902,601

Source: National Exchange Carrier Association (NECA), MOU Data/Summary of NECA's Total Pool Results, March 15, 2010.

Exhibit SMG-5

(USF Local Switching Support by Study Area: 2 Q 2011)

Source: USAC Appendix HC08, 2Q 2011, accessed at
www.usac.org/about/governance/fcc-filings/2011/quarter-2.aspxra on April 8, 2011.

UNIVERSAL SERVICE ADMINISTRATIVE COMPANY
Local Switching Support Projected by State by Study Area
Second Quarter 2011

Appendix HC08
2Q2011
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State	SAC	Study Area Name	Rural	Type	LSS	Certified	Working Loops	Monthly Support Amounts				Annual Total Support Amount
								Jan- Mar	Apr-Jun	Jul-Sep	Oct-Dec	
IA	350739	REASNOR TELEPHONE COMPANY	R	A	Y	Y	224	\$ -	\$ 2,029	\$ 2,029	\$ 2,029	\$ 18,261
IA	351096	HEARTLND-HICKORYTECH	R	C	Y	Y	9,624	\$ 74,675	\$ 74,675	\$ 74,675	\$ 74,675	\$ 896,100
IA	351097	ANDREW TEL CO INC	R	A	Y	Y	314	\$ 1,571	\$ 1,571	\$ 1,571	\$ 1,571	\$ 18,852
IA	351098	ARCADIA TEL CO	R	A	Y	Y	328	\$ 1,685	\$ 1,685	\$ 1,685	\$ 1,685	\$ 20,220
IA	351101	ATKINS TEL CO, INC	R	A	Y	Y	880	\$ 3,390	\$ 3,390	\$ 3,390	\$ 3,390	\$ 40,680
IA	351105	AYRSHIRE FARMERS MUT	R	C	Y	Y	266	\$ 1,731	\$ 1,731	\$ 1,731	\$ 1,731	\$ 20,772
IA	351106	ALPINE COMM.	R	C	Y	Y	5,398	\$ 20,752	\$ 20,752	\$ 20,752	\$ 20,752	\$ 249,024
IA	351107	BALDWIN-NASHVILLE	R	A	Y	Y	292	\$ 1,620	\$ 1,620	\$ 1,620	\$ 1,620	\$ 19,440
IA	351108	BARNES CITY COOP	R	A	Y	Y	133	\$ 1,088	\$ 1,088	\$ 1,088	\$ 1,088	\$ 13,056
IA	351110	BERNARD TEL CO INC	R	C	Y	Y	485	\$ 6,305	\$ 6,305	\$ 6,305	\$ 6,305	\$ 75,660
IA	351112	BREDA TEL CORP.	R	A	Y	Y	1,036	\$ 5,698	\$ 5,698	\$ 5,698	\$ 5,698	\$ 68,376
IA	351113	BROOKLYN MUTUAL TEL	R	A	Y	Y	1,381	\$ 4,817	\$ 4,817	\$ 4,817	\$ 4,817	\$ 57,804
IA	351114	THE BURT TEL CO	R	A	Y	Y	364	\$ 2,429	\$ 2,429	\$ 2,429	\$ 2,429	\$ 29,148
IA	351115	BUTLER-BREMER MUTUAL	R	A	Y	Y	1,769	\$ 6,588	\$ 6,588	\$ 6,588	\$ 6,588	\$ 79,056
IA	351118	CASCADE COMM. CO.	R	A	Y	Y	1,749	\$ 5,956	\$ 5,956	\$ 5,956	\$ 5,956	\$ 71,472
IA	351119	CASEY MUTUAL TEL CO	R	A	Y	Y	359	\$ 1,820	\$ 1,820	\$ 1,820	\$ 1,820	\$ 21,840
IA	351121	CENTER JUNCTION TEL	R	A	Y	Y	127	\$ 810	\$ 810	\$ 810	\$ 810	\$ 9,720
IA	351125	CENTRAL SCOTT TEL CO	R	A	Y	Y	4,742	\$ 15,485	\$ 15,485	\$ 15,485	\$ 15,485	\$ 185,820
IA	351126	CENTURYTEL-CHESTER	R	A	Y	Y	167	\$ 2,376	\$ 2,376	\$ 2,376	\$ 2,376	\$ 28,512
IA	351127	FRONTIER IOWA	R	C	Y	Y	41,325	\$ 80,084	\$ 80,084	\$ 80,084	\$ 80,084	\$ 961,008
IA	351129	CITIZENS MUTUAL TEL	R	C	Y	Y	3,495	\$ 7,612	\$ 7,612	\$ 7,612	\$ 7,612	\$ 91,344
IA	351130	CLARENCE TEL CO	R	A	Y	Y	645	\$ 1,396	\$ 1,396	\$ 1,396	\$ 1,396	\$ 16,752
IA	351132	CLEAR LAKE INDEPND	R	C	Y	Y	5,117	\$ 5,087	\$ 5,087	\$ 5,087	\$ 5,087	\$ 61,044
IA	351133	C-M-L TEL COOP ASSN	R	A	Y	Y	761	\$ 4,972	\$ 4,972	\$ 4,972	\$ 4,972	\$ 59,664
IA	351134	COLO TEL CO	R	C	Y	Y	617	\$ 5,011	\$ 5,011	\$ 5,011	\$ 5,011	\$ 60,132
IA	351136	COON CREEK TEL CO	R	A	Y	Y	531	\$ 2,832	\$ 2,832	\$ 2,832	\$ 2,832	\$ 33,984
IA	351137	COON VALLEY COOP TEL	R	A	Y	Y	558	\$ 2,983	\$ 2,983	\$ 2,983	\$ 2,983	\$ 35,796
IA	351139	COOPERATIVE TEL CO	R	A	Y	Y	1,385	\$ 5,729	\$ 5,729	\$ 5,729	\$ 5,729	\$ 68,748
IA	351141	CORN BELT TEL CO	R	A	Y	Y	750	\$ 4,272	\$ 4,272	\$ 4,272	\$ 4,272	\$ 51,264
IA	351146	CUMBERLAND TEL CO	R	A	Y	Y	319	\$ 1,763	\$ 1,763	\$ 1,763	\$ 1,763	\$ 21,156
IA	351147	DANVILLE MUTUAL TEL	R	A	Y	Y	780	\$ 3,882	\$ 3,882	\$ 3,882	\$ 3,882	\$ 46,584
IA	351149	FARMERS (DEFIANCE)	R	A	Y	Y	250	\$ 2,019	\$ 2,019	\$ 2,019	\$ 2,019	\$ 24,228
IA	351150	DIXON TEL CO	R	A	Y	Y	523	\$ 2,329	\$ 2,329	\$ 2,329	\$ 2,329	\$ 27,948
IA	351152	DUMONT TEL CO	R	A	Y	Y	1,306	\$ 5,119	\$ 5,119	\$ 5,119	\$ 5,119	\$ 61,428
IA	351153	DUNKERTON TEL COOP	R	A	Y	Y	635	\$ 2,858	\$ 2,858	\$ 2,858	\$ 2,858	\$ 34,296
IA	351156	EAST BUCHANAN COOP	R	C	Y	Y	1,493	\$ 4,064	\$ 4,064	\$ 4,064	\$ 4,064	\$ 48,768
IA	351157	ELLSWORTH COOP ASSN	R	A	Y	Y	676	\$ 4,145	\$ 4,145	\$ 4,145	\$ 4,145	\$ 49,740
IA	351158	MINBURN TELECOMM.	R	C	Y	Y	743	\$ 4,219	\$ 4,219	\$ 4,219	\$ 4,219	\$ 50,628
IA	351160	FARMERS&BUSINESS MEN	R	A	Y	Y	923	\$ 5,931	\$ 5,931	\$ 5,931	\$ 5,931	\$ 71,172
IA	351162	FARMERS COOP TEL CO	R	A	Y	Y	1,172	\$ 5,463	\$ 5,463	\$ 5,463	\$ 5,463	\$ 65,556
IA	351166	FARMERS & MERCHANTS	R	A	Y	Y	774	\$ 3,703	\$ 3,703	\$ 3,703	\$ 3,703	\$ 44,436
IA	351168	FARMERS MUTUAL COOP	R	A	Y	Y	1,731	\$ 11,711	\$ 11,711	\$ 11,711	\$ 11,711	\$ 140,532
IA	351169	FARMERS MUTUAL COOP	R	A	Y	Y	477	\$ 6,951	\$ 6,951	\$ 6,951	\$ 6,951	\$ 83,412
IA	351170	WINDSTREAM COMMUNICATIONS, INC.	R	C	Y	Y	49,500	\$ -	\$ 83,911	\$ 83,911	\$ 83,911	\$ 755,199
IA	351170	WINDSTREAM COMMUNICATIONS, INC.	R	C	Y	N	53,243	\$ 83,911	\$ -	\$ -	\$ -	\$ 251,733
IA	351171	FARMERS MUTUAL JESUP	R	A	Y	Y	1,936	\$ 6,034	\$ 6,034	\$ 6,034	\$ 6,034	\$ 72,408
IA	351172	FARMERS MUTUAL TEL	R	C	Y	Y	2,025	\$ 37,665	\$ 37,665	\$ 37,665	\$ 37,665	\$ 451,980
IA	351173	FARMERS MUTUAL COOP	R	A	Y	Y	2,203	\$ 7,547	\$ 7,547	\$ 7,547	\$ 7,547	\$ 90,564
IA	351174	FARMERS MUTUAL TEL	R	A	Y	Y	982	\$ 16,097	\$ 16,097	\$ 16,097	\$ 16,097	\$ 193,164
IA	351175	FARMERS TEL CO - BAT	R	A	Y	Y	370	\$ 1,729	\$ 1,729	\$ 1,729	\$ 1,729	\$ 20,748
IA	351176	FARMERS TEL CO-ESSEX	R	A	Y	Y	489	\$ 3,289	\$ 3,289	\$ 3,289	\$ 3,289	\$ 39,468
IA	351177	FARMERS TEL CO -RICE	R	A	Y	Y	1,416	\$ 7,985	\$ 7,985	\$ 7,985	\$ 7,985	\$ 95,820
IA	351179	FENTON CO-OP TEL CO	R	A	Y	Y	300	\$ 2,077	\$ 2,077	\$ 2,077	\$ 2,077	\$ 24,924
IA	351187	PARTNER COMM. COOP.	R	C	Y	Y	975	\$ 9,512	\$ 9,512	\$ 9,512	\$ 9,512	\$ 114,144
IA	351188	GOLDFIELD TEL CO	R	A	Y	Y	498	\$ 3,003	\$ 3,003	\$ 3,003	\$ 3,003	\$ 36,036

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								Jan- Mar	Apr-Jun	Jul-Sep	Oct-Dec	
IA	351189	RIVER VALLEY TELECOM	R	A	Y	Y	820	\$ 4,937	\$ 4,937	\$ 4,937	\$ 4,937	\$ 59,244
IA	351191	GRAND MOUND COOP TEL	R	A	Y	Y	461	\$ 2,863	\$ 2,863	\$ 2,863	\$ 2,863	\$ 34,356
IA	351195	GRISWOLD CO-OP TEL	R	A	Y	Y	1,691	\$ 9,956	\$ 9,956	\$ 9,956	\$ 9,956	\$ 119,472
IA	351199	HAWKEYE TEL CO	R	A	Y	Y	414	\$ 2,340	\$ 2,340	\$ 2,340	\$ 2,340	\$ 28,080
IA	351202	HOSPERS TEL EXCH INC	R	A	Y	Y	700	\$ 3,587	\$ 3,587	\$ 3,587	\$ 3,587	\$ 43,044
IA	351203	HUBBARD COOP ASSN	R	A	Y	Y	722	\$ 3,289	\$ 3,289	\$ 3,289	\$ 3,289	\$ 39,468
IA	351205	HUXLEY COMM. COOP.	R	A	Y	Y	1,315	\$ 8,484	\$ 8,484	\$ 8,484	\$ 8,484	\$ 101,808
IA	351206	IAMO TEL CO - IA	R	A	Y	Y	325	\$ 5,051	\$ 5,051	\$ 5,051	\$ 5,051	\$ 60,612
IA	351209	INTERSTATE 35 TEL CO	R	A	Y	Y	1,132	\$ 10,959	\$ 10,959	\$ 10,959	\$ 10,959	\$ 131,508
IA	351212	JEFFERSON TEL CO -IA	R	A	Y	Y	3,122	\$ 8,028	\$ 8,028	\$ 8,028	\$ 8,028	\$ 96,336
IA	351213	JORDAN SOLDIERVALLEY	R	A	Y	Y	604	\$ 6,109	\$ 7,069	\$ 7,069	\$ 7,069	\$ 81,948
IA	351214	KALONA COOP TEL CO	R	C	Y	Y	1,851	\$ 12,991	\$ 12,991	\$ 12,991	\$ 12,991	\$ 155,892
IA	351217	KEYSTONE FRMS COOP	R	A	Y	Y	897	\$ 4,317	\$ 4,317	\$ 4,317	\$ 4,317	\$ 51,804
IA	351220	LA PORTE CITY TEL CO	R	A	Y	Y	1,366	\$ 5,311	\$ 5,311	\$ 5,311	\$ 5,311	\$ 63,732
IA	351222	LA MOTTE TEL CO	R	A	Y	Y	694	\$ 2,800	\$ 2,800	\$ 2,800	\$ 2,800	\$ 33,600
IA	351225	LEHIGH VALLEY COOP	R	A	Y	Y	1,616	\$ 6,412	\$ 6,412	\$ 6,412	\$ 6,412	\$ 76,944
IA	351228	LONE ROCK CO-OP TEL	R	A	Y	Y	254	\$ 1,553	\$ 1,553	\$ 1,553	\$ 1,553	\$ 18,636
IA	351229	LOST NATION-ELWOOD	R	C	Y	Y	565	\$ 2,515	\$ 2,515	\$ 2,515	\$ 2,515	\$ 30,180
IA	351230	NORTHEAST IOWA TEL	R	A	Y	Y	1,777	\$ 9,041	\$ 9,041	\$ 9,041	\$ 9,041	\$ 108,492
IA	351232	LYNNVILLE TEL. CO.	R	A	Y	Y	532	\$ 9,112	\$ 9,112	\$ 9,112	\$ 9,112	\$ 109,344
IA	351235	FARMERS (MANILLA)	R	A	Y	Y	555	\$ 3,676	\$ 3,676	\$ 3,676	\$ 3,676	\$ 44,112
IA	351237	MARNE & ELK HORN TEL	R	A	Y	Y	1,321	\$ 8,278	\$ 8,278	\$ 8,278	\$ 8,278	\$ 99,336
IA	351238	MARTELLE COOP ASSN	R	A	Y	Y	290	\$ 1,508	\$ 1,508	\$ 1,508	\$ 1,508	\$ 18,096
IA	351239	MASSENA TEL CO	R	A	Y	Y	545	\$ 3,986	\$ 3,986	\$ 3,986	\$ 3,986	\$ 47,832
IA	351241	MECHANICSVILLE TEL	R	A	Y	Y	725	\$ 3,353	\$ 3,353	\$ 3,353	\$ 3,353	\$ 40,236
IA	351242	MILES COOP TEL ASSN	R	A	Y	Y	683	\$ 2,842	\$ 2,842	\$ 2,842	\$ 2,842	\$ 34,104
IA	351245	MINBURN TEL CO	R	A	Y	Y	348	\$ 1,924	\$ 1,924	\$ 1,924	\$ 1,924	\$ 23,088
IA	351246	MINERVA VALLEY TEL	R	A	Y	Y	683	\$ 3,583	\$ 3,583	\$ 3,583	\$ 3,583	\$ 42,996
IA	351247	MODERN COOP TEL CO	R	A	Y	Y	837	\$ 4,057	\$ 4,057	\$ 4,057	\$ 4,057	\$ 48,684
IA	351248	MONTEZUMA MUTUAL TEL	R	A	Y	Y	1,578	\$ 7,587	\$ 7,587	\$ 7,587	\$ 7,587	\$ 91,044
IA	351250	MUTUAL TEL CO	R	A	Y	Y	509	\$ 2,854	\$ 2,854	\$ 2,854	\$ 2,854	\$ 34,248
IA	351251	MEDIAPOLIS TEL CO	R	A	Y	Y	1,834	\$ 8,989	\$ 8,989	\$ 8,989	\$ 8,989	\$ 107,868
IA	351252	MUTUAL TEL CO	R	A	Y	Y	4,384	\$ 32,216	\$ 32,216	\$ 32,216	\$ 32,216	\$ 386,592
IA	351257	NORTH ENGLISH COOP	R	A	Y	Y	773	\$ 3,010	\$ 3,010	\$ 3,010	\$ 3,010	\$ 36,120
IA	351259	NORTHERN IOWA TEL CO	R	A	Y	Y	2,130	\$ 10,453	\$ 10,453	\$ 10,453	\$ 10,453	\$ 125,436
IA	351260	NORTHWEST IOWA TEL	R	A	Y	Y	4,258	\$ 10,903	\$ 10,903	\$ 10,903	\$ 10,903	\$ 130,836
IA	351261	NORTHWEST TEL COOP	R	A	Y	Y	1,141	\$ 6,685	\$ 6,685	\$ 6,685	\$ 6,685	\$ 80,220
IA	351262	COMM 1 NETWORK	R	A	Y	Y	549	\$ 14,080	\$ 14,080	\$ 14,080	\$ 14,080	\$ 168,960
IA	351263	OGDEN TEL CO - IA	R	A	Y	Y	1,514	\$ 6,888	\$ 6,888	\$ 6,888	\$ 6,888	\$ 82,656
IA	351264	OLIN TEL CO, INC	R	A	Y	Y	639	\$ 3,027	\$ 3,027	\$ 3,027	\$ 3,027	\$ 36,324
IA	351265	ONSLow COOP TEL ASSN	R	A	Y	Y	196	\$ 1,479	\$ 1,479	\$ 1,479	\$ 1,479	\$ 17,748
IA	351266	ORAN MUTUAL TEL CO	R	A	Y	Y	241	\$ 1,237	\$ 1,237	\$ 1,237	\$ 1,237	\$ 14,844
IA	351269	PALO COOP TEL ASSN	R	A	Y	Y	481	\$ 4,191	\$ 4,191	\$ 4,191	\$ 4,191	\$ 50,292
IA	351270	PALMER MUTUAL TEL CO	R	A	Y	Y	266	\$ 1,747	\$ 1,747	\$ 1,747	\$ 1,747	\$ 20,964
IA	351271	PANORA COMM COOP	R	A	Y	Y	1,804	\$ 9,795	\$ 9,795	\$ 9,795	\$ 9,795	\$ 117,540
IA	351273	PEOPLES TEL CO - IA	R	A	Y	Y	745	\$ 4,990	\$ 4,990	\$ 4,990	\$ 4,990	\$ 59,880
IA	351274	CENTURYTEL-POSTVILLE	R	A	Y	Y	1,375	\$ 14,098	\$ 14,098	\$ 14,098	\$ 14,098	\$ 169,176
IA	351275	PRAIRIEBURG TEL CO	R	A	Y	Y	189	\$ 1,247	\$ 1,247	\$ 1,247	\$ 1,247	\$ 14,964
IA	351276	PRESTON TEL CO	R	A	Y	Y	1,041	\$ 3,981	\$ 3,981	\$ 3,981	\$ 3,981	\$ 47,772
IA	351277	RADCLIFFE TEL CO	R	A	Y	Y	468	\$ 951	\$ 951	\$ 951	\$ 951	\$ 11,412
IA	351278	READLYN TEL CO	R	A	Y	Y	869	\$ 13,093	\$ 13,093	\$ 13,093	\$ 13,093	\$ 157,116
IA	351280	RINGSTED TEL CO	R	A	Y	Y	354	\$ 2,268	\$ 2,268	\$ 2,268	\$ 2,268	\$ 27,216
IA	351282	ROCKWELL COOP ASSN	R	A	Y	Y	1,169	\$ 5,323	\$ 5,323	\$ 5,323	\$ 5,323	\$ 63,876
IA	351283	ROYAL TEL CO	R	A	Y	Y	392	\$ 5,933	\$ 5,933	\$ 5,933	\$ 5,933	\$ 71,196
IA	351284	RUTHVEN TEL EXCHANGE	R	A	Y	Y	690	\$ 3,792	\$ 3,792	\$ 3,792	\$ 3,792	\$ 45,504

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								Jan- Mar	Apr-Jun	Jul-Sep	Oct-Dec	
IA	351285	SAC COUNTY MUTUAL	R	A	Y	Y	954	\$ 5,551	\$ 5,551	\$ 5,551	\$ 5,551	\$ 66,612
IA	351291	SCHALLER TEL CO	R	A	Y	Y	1,611	\$ 16,075	\$ 16,075	\$ 16,075	\$ 16,075	\$ 192,900
IA	351292	SEARSBORO TEL CO	R	A	Y	Y	211	\$ 5,421	\$ 5,421	\$ 5,421	\$ 5,421	\$ 65,052
IA	351293	SHARON TEL CO	R	A	Y	Y	1,019	\$ 5,372	\$ 5,372	\$ 5,372	\$ 5,372	\$ 64,464
IA	351294	SCRANTON TEL CO	R	A	Y	Y	470	\$ 3,853	\$ 3,853	\$ 3,853	\$ 3,853	\$ 46,236
IA	351295	SHELL ROCK TEL CO	R	C	Y	Y	868	\$ 3,605	\$ 3,605	\$ 3,605	\$ 3,605	\$ 43,260
IA	351297	HEART OF IOWA COMM.	R	A	Y	Y	2,192	\$ 10,636	\$ 10,636	\$ 10,636	\$ 10,636	\$ 127,632
IA	351298	SOUTH SLOPE COOP TEL	R	A	Y	Y	10,544	\$ 6,741	\$ 6,741	\$ 6,741	\$ 6,741	\$ 80,892
IA	351301	SOUTHWEST TEL EXCH	R	A	Y	Y	620	\$ 5,195	\$ 5,195	\$ 5,195	\$ 5,195	\$ 62,340
IA	351302	SPRINGVILLE COOP TEL	R	A	Y	Y	1,126	\$ 4,195	\$ 4,195	\$ 4,195	\$ 4,195	\$ 50,340
IA	351303	COOP TEL EXCHANGE	R	C	Y	Y	615	\$ 5,690	\$ 5,690	\$ 5,690	\$ 5,690	\$ 68,280
IA	351304	SWISHER TEL CO	R	A	Y	Y	776	\$ 4,177	\$ 4,177	\$ 4,177	\$ 4,177	\$ 50,124
IA	351305	STRATFORD MUTUAL TEL	R	A	Y	Y	584	\$ 7,589	\$ 7,589	\$ 7,589	\$ 7,589	\$ 91,068
IA	351306	SULLY TEL ASSOC	R	A	Y	Y	1,240	\$ 15,180	\$ 15,180	\$ 15,180	\$ 15,180	\$ 182,160
IA	351307	SUPERIOR TEL COOP	R	A	Y	Y	174	\$ 1,625	\$ 1,625	\$ 1,625	\$ 1,625	\$ 19,500
IA	351308	TEMPLETON TEL CO	R	A	Y	Y	384	\$ 1,925	\$ 1,925	\$ 1,925	\$ 1,925	\$ 23,100
IA	351309	TERRIL TEL. COOP.	R	A	Y	Y	490	\$ 6,423	\$ 6,423	\$ 6,423	\$ 6,423	\$ 77,076
IA	351310	TITONKA TEL CO	R	A	Y	Y	497	\$ 2,882	\$ 2,882	\$ 2,882	\$ 2,882	\$ 34,584
IA	351316	UNITED FARMERS TEL	R	C	Y	Y	498	\$ 5,960	\$ 5,960	\$ 5,960	\$ 5,960	\$ 71,520
IA	351319	VAN BUREN TEL CO	R	A	Y	Y	2,417	\$ 10,044	\$ 10,044	\$ 10,044	\$ 10,044	\$ 120,528
IA	351320	VAN HORNE COOP TEL	R	A	Y	Y	501	\$ 6,268	\$ 6,268	\$ 6,268	\$ 6,268	\$ 75,216
IA	351322	VENTURA TEL CO, INC	R	A	Y	Y	425	\$ 2,240	\$ 2,240	\$ 2,240	\$ 2,240	\$ 26,880
IA	351324	VILLISCA FARMERS TEL	R	A	Y	Y	873	\$ 5,818	\$ 5,818	\$ 5,818	\$ 5,818	\$ 69,816
IA	351326	WALNUT TEL CO, INC	R	A	Y	Y	696	\$ 3,840	\$ 3,840	\$ 3,840	\$ 3,840	\$ 46,080
IA	351327	WEBB-DICKENS TEL	R	C	Y	Y	353	\$ -	\$ -	\$ -	\$ -	\$ -
IA	351328	WEBSTER-CALHOUN COOP	R	A	Y	Y	4,361	\$ 3,296	\$ 3,296	\$ 3,296	\$ 3,296	\$ 39,552
IA	351329	WELLMAN COOP TEL	R	A	Y	Y	1,210	\$ 6,837	\$ 6,837	\$ 6,837	\$ 6,837	\$ 82,044
IA	351331	WEST IOWA TEL CO	R	A	Y	Y	4,415	\$ 11,458	\$ 11,458	\$ 11,458	\$ 11,458	\$ 137,496
IA	351332	WEST LIBERTY TEL CO	R	C	Y	Y	3,284	\$ 5,064	\$ 5,064	\$ 5,064	\$ 5,064	\$ 60,768
IA	351334	WESTERN IOWA ASSN	R	A	Y	Y	3,420	\$ 10,583	\$ 10,583	\$ 10,583	\$ 10,583	\$ 126,996
IA	351335	WESTSIDE INDEPENDENT	R	A	Y	Y	321	\$ 1,740	\$ 1,740	\$ 1,740	\$ 1,740	\$ 20,880
IA	351336	WILTON TEL CO	R	A	Y	Y	1,539	\$ 5,934	\$ 5,934	\$ 5,934	\$ 5,934	\$ 71,208
IA	351337	WINNEBAGO COOP ASSN	R	A	Y	Y	5,917	\$ 16,295	\$ 16,295	\$ 16,295	\$ 16,295	\$ 195,540
IA	351342	WOOLSTOCK MUTUAL	R	A	Y	Y	202	\$ 1,176	\$ 1,176	\$ 1,176	\$ 1,176	\$ 14,112
IA	351343	WYOMING MUTUAL TEL	R	A	Y	Y	546	\$ 6,946	\$ 6,946	\$ 6,946	\$ 6,946	\$ 83,352
IA	351344	PRAIRIE TEL CO	R	A	Y	Y	897	\$ 6,175	\$ 6,175	\$ 6,175	\$ 6,175	\$ 74,100
IA	351346	ACE TEL ASSN-IA	R	C	Y	Y	4,122	\$ 23,146	\$ 23,146	\$ 23,146	\$ 23,146	\$ 277,752
IA	351405	HILLS TEL CO, INC-IA	R	A	Y	Y	2,067	\$ 17,635	\$ 17,635	\$ 17,635	\$ 17,635	\$ 211,620
IA	351407	KILLDUFF TEL. CO.	R	A	Y	Y	202	\$ -	\$ 10,575	\$ 10,575	\$ 10,575	\$ 95,175
IA	351424	MABEL COOP TEL-IA	R	A	Y	Y	930	\$ 7,960	\$ 7,960	\$ 7,960	\$ 7,960	\$ 95,520
IA	351888	GRAND RIVER MUT-IA	R	C	Y	Y	6,692	\$ 17,557	\$ 17,557	\$ 17,557	\$ 17,557	\$ 210,684
IA	359001	CITY OF HAWARDEN DBA HITEC	R	X	Y	Y	1,054	\$ 8,631	\$ 8,617	\$ 8,617	\$ 8,617	\$ 103,446
IA	359008	SOUTH SLOPE COOPERATIVE	R	X	Y	Y	2,311	\$ 1,407	\$ 1,373	\$ 1,373	\$ 1,373	\$ 16,578
IA	359010	MIDWEST WIRELESS IOWA, LLC	R	X	N	Y	7,388	\$ 48,862	\$ 35,273	\$ 35,273	\$ 35,273	\$ 464,043
IA	359010	MIDWEST WIRELESS IOWA, LLC	R	X	Y	Y	24,321	\$ 151,713	\$ 157,658	\$ 157,658	\$ 157,658	\$ 1,874,061
IA	359016	UNITED STATES CELLULAR	R	X	Y	Y	166,049	\$ 708,107	\$ 722,720	\$ 722,720	\$ 722,720	\$ 8,628,801
IA	359016	UNITED STATES CELLULAR	R	X	N	Y	2,002	\$ 20,157	\$ 20,787	\$ 20,787	\$ 20,787	\$ 247,554
IA	359022	COMMUNITY CABLE TELEVISION COMPANY OF O'BRIEN COUNTY	R	X	Y	Y	443	\$ 2,287	\$ 2,174	\$ 2,174	\$ 2,174	\$ 26,427
IA	359027	IOWA WIRELESS SERVICES, L.P.	R	X	Y	Y	2,508	\$ 11,585	\$ 11,506	\$ 11,506	\$ 11,506	\$ 138,309
IA	359027	IOWA WIRELESS SERVICES, L.P.	R	X	N	Y	263	\$ 669	\$ 796	\$ 796	\$ 796	\$ 9,171
IA	359028	MAC WIRELESS, LLC	R	X	Y	Y	416	\$ 2,578	\$ 2,518	\$ 2,518	\$ 2,518	\$ 30,396
IA	359029	SOUTHEAST WIRELESS, INC.	R	X	Y	Y	794	\$ 2,762	\$ 3,987	\$ 3,987	\$ 3,987	\$ 44,169
IA	359030	COOPERATIVE TELEPHONE CO.	R	X	Y	Y	219	\$ 810	\$ 905	\$ 905	\$ 905	\$ 10,575
IA	359031	OLIN TELEPHONE CO., INC.	R	X	Y	Y	441	\$ 2,128	\$ 2,069	\$ 2,069	\$ 2,069	\$ 25,005
IA	359032	CST COMMUNICATIONS, INC	R	X	Y	Y	837	\$ -	\$ 2,733	\$ 2,733	\$ 2,733	\$ 24,597

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IA	359033	MONTEZUMA MUTUAL TELEPHONE CO.	R	X	Y	Y	219	\$ 1,091	\$ 1,053	\$ 1,053	\$ 1,053	\$ 12,750
IA	359034	MILL VALLEY WIRELESS	R	X	Y	Y	137	\$ 528	\$ 553	\$ 553	\$ 553	\$ 6,561
IA	359036	EAST BUCHANAN TELEPHONE COOPERATIVE	R	X	Y	Y	585	\$ 1,678	\$ 1,591	\$ 1,591	\$ 1,591	\$ 19,353
IA	359037	KCTC PCS	R	X	Y	Y	839	\$ 5,623	\$ -	\$ -	\$ -	\$ 16,869
IA	359038	SHARON TELEPHONE COMPANY	R	X	Y	Y	173	\$ 290	\$ 917	\$ 917	\$ 917	\$ 9,123
IA	359039	WELLMAN COOP. TELEPHONE ASSOC.	R	X	Y	Y	562	\$ 3,212	\$ 3,176	\$ 3,176	\$ 3,176	\$ 38,220
IA	359041	WAPSI WIRELESS, LLC	R	X	Y	Y	1,070	\$ 5,204	\$ 5,242	\$ 5,242	\$ 5,242	\$ 62,790
IA	359043	NORTHEAST IOWA TELEPHONE CO.	R	X	Y	Y	668	\$ 4,140	\$ 4,026	\$ 4,026	\$ 4,026	\$ 48,654
IA	359044	COMMUNITY DIGITAL WIRELESS, LLC	R	X	Y	Y	281	\$ 2,451	\$ 2,309	\$ 2,309	\$ 2,309	\$ 28,134
IA	359045	SEI WIRELESS LLC	R	X	Y	Y	13	\$ 50	\$ 62	\$ 62	\$ 62	\$ 708
IA	359046	CEDAR COUNTY PCS, LLC	R	X	N	Y	656	\$ -	\$ 1,012	\$ 1,012	\$ 1,012	\$ 9,108
IA	359046	CEDAR COUNTY PCS, LLC	R	X	Y	Y	624	\$ 2,173	\$ 2,113	\$ 2,113	\$ 2,113	\$ 25,536
IA	359047	BROOKLYN MUTUAL TELEPHONE CO.	R	X	Y	Y	119	\$ 499	\$ 459	\$ 459	\$ 459	\$ 5,628
IA	359053	IOWA RSA NO. 2 LIMITED PARTNERSHIP	R	X	N	Y	8	\$ 32	\$ 43	\$ 43	\$ 43	\$ 483
IA	359053	IOWA RSA NO. 2 LIMITED PARTNERSHIP	R	X	Y	Y	1,226	\$ 3,167	\$ 3,217	\$ 3,217	\$ 3,217	\$ 38,454
IA	359054	RSA 1 LIMITED PARTNERSHIP	R	X	Y	Y	1,780	\$ 15,184	\$ 15,314	\$ 15,314	\$ 15,314	\$ 183,378
IA	359054	RSA 1 LIMITED PARTNERSHIP	R	X	N	Y	1,760	\$ 15,343	\$ 16,275	\$ 16,275	\$ 16,275	\$ 192,504
IA	359059	FARMERS MUTUAL TELEPHONE COMPANY-HARLAN	R	X	Y	Y	266	\$ 1,924	\$ 1,827	\$ 1,827	\$ 1,827	\$ 22,215
IA	359060	NPCR, INC.	R	X	Y	Y	15,165	\$ 57,621	\$ 54,524	\$ 54,524	\$ 54,524	\$ 663,579
IA	359060	NPCR, INC.	R	X	N	Y	44	\$ 1,276	\$ 1,284	\$ 1,284	\$ 1,284	\$ 15,384
IA	359070	IOWA RSA 7	R	X	Y	Y	12,386	\$ 41,640	\$ 41,650	\$ 41,650	\$ 41,650	\$ 499,770
IA	359070	IOWA RSA 7	R	X	N	Y	10	\$ 68	\$ 68	\$ 68	\$ 68	\$ 816
IA	359071	IOWA RSA 8	R	X	Y	Y	17,941	\$ 31,007	\$ 30,101	\$ 30,101	\$ 30,101	\$ 363,930
IA	359071	IOWA RSA 8	R	X	N	Y	42	\$ 122	\$ 122	\$ 122	\$ 122	\$ 1,464
IA	359072	IOWA RSA 10	R	X	Y	Y	14,738	\$ 43,762	\$ 43,658	\$ 43,658	\$ 43,658	\$ 524,208
IA	359072	IOWA RSA 10	R	X	N	Y	9,579	\$ 498	\$ 617	\$ 617	\$ 617	\$ 7,047
IA	359075	BARNES CITY COOPERATIVE TELEPHONE COMPANY	R	X	Y	Y	16	\$ 131	\$ 131	\$ 131	\$ 131	\$ 1,572
IA	359081	D-C COMMUNICATIONS	R	X	Y	Y	264	\$ 1,244	\$ 1,231	\$ 1,231	\$ 1,231	\$ 14,811
IA	359082	FMTIC WIRELESS	R	X	Y	Y	445	\$ 8,683	\$ 8,277	\$ 8,277	\$ 8,277	\$ 100,542
IA	359082	FMTIC WIRELESS	R	X	N	Y	92	\$ 492	\$ 519	\$ 519	\$ 519	\$ 6,147
IA	359083	DUMONT WIRELESS	R	X	Y	Y	274	\$ 1,093	\$ 1,074	\$ 1,074	\$ 1,074	\$ 12,945
IA	359084	CEDAR-WAPSIE COMMUNICATIONS, INC.	R	X	Y	Y	423	\$ 1,583	\$ 1,575	\$ 1,575	\$ 1,575	\$ 18,924
IA	359086	ROCKWELL COOPERATIVE TELEPHONE ASSOCIATION WIRELESS	R	X	Y	Y	540	\$ 2,342	\$ 2,412	\$ 2,412	\$ 2,412	\$ 28,734
IA	359086	ROCKWELL COOPERATIVE TELEPHONE ASSOCIATION WIRELESS	R	X	N	Y	212	\$ -	\$ -	\$ -	\$ -	\$ -
IA	359087	BALDWIN NASHVILLE TELEPHONE COMPANY WIRELESS	R	X	Y	Y	77	\$ 466	\$ 427	\$ 427	\$ 427	\$ 5,241
IA	359088	ONSLow COOPERATIVE TELEPHONE ASSOCIATION WIRELESS	R	X	Y	Y	71	\$ 518	\$ 536	\$ 536	\$ 536	\$ 6,378
IA	359089	OGDEN TELEPHONE COMPANY	R	X	Y	Y	41	\$ 205	\$ 187	\$ 187	\$ 187	\$ 2,298
IA	359090	CENTER JUNCTION TELEPHONE CO.	R	X	Y	Y	34	\$ 223	\$ 217	\$ 217	\$ 217	\$ 2,622
IA	359091	VAN BUREN WIRELESS COMPANY, INC.	R	X	Y	Y	935	\$ 3,433	\$ 3,429	\$ 3,429	\$ 3,429	\$ 41,160
IA	359092	RADCLIFFE TELEPHONE CO., INC. (WIRELESS)	R	X	Y	Y	22	\$ 49	\$ 45	\$ 45	\$ 45	\$ 552
IA	359093	WINNEBAGO COOPERATIVE TELEPHONE ASSOCIATION	R	X	Y	Y	1,520	\$ 4,147	\$ 4,186	\$ 4,186	\$ 4,186	\$ 50,115
IA	359094	AVENTURE COMMUNICATION TECHNOLOGY, LLC	R	X	Y	Y	2,373	\$ 17,114	\$ 14,943	\$ 14,943	\$ 14,943	\$ 185,829
IA	359098	COMM 1 WIRELESS INC.	R	X	N	Y	13	\$ -	\$ -	\$ -	\$ -	\$ -
IA	359098	COMM 1 WIRELESS INC.	R	X	Y	Y	423	\$ 10,746	\$ 10,849	\$ 10,849	\$ 10,849	\$ 129,879
IA	359100	HARDIN COUNTY WIRELESS	R	X	N	Y	7	\$ 31	\$ 43	\$ 43	\$ 43	\$ 480
IA	359100	HARDIN COUNTY WIRELESS	R	X	Y	Y	431	\$ 2,199	\$ 2,053	\$ 2,053	\$ 2,053	\$ 25,074
IA	359101	LONG LINES WIRELESS, LLC	R	X	Y	Y	4,047	\$ 15,409	\$ 15,111	\$ 15,111	\$ 15,111	\$ 182,226
IA	359101	LONG LINES WIRELESS, LLC	R	X	N	Y	2,599	\$ 1,579	\$ 1,546	\$ 1,546	\$ 1,546	\$ 18,651
IA	359102	CCM WIRELESS, INC.	R	X	Y	Y	115	\$ 926	\$ 934	\$ 934	\$ 934	\$ 11,184
IA	359103	BERNARD COMMUNICATIONS, INC.	R	X	Y	Y	171	\$ 2,314	\$ 2,223	\$ 2,223	\$ 2,223	\$ 26,949
IA	359104	COMMUNICATIONS NETWORK, INC.	R	X	N	Y	1,082	\$ 944	\$ 862	\$ 862	\$ 862	\$ 10,590
IA	359107	NORTH CENTRAL WIRELESS	R	X	N	Y	226	\$ -	\$ -	\$ -	\$ -	\$ -
IA	359107	NORTH CENTRAL WIRELESS	R	X	Y	Y	175	\$ 1,055	\$ 1,055	\$ 1,055	\$ 1,055	\$ 12,660
IA	359109	MODERN COMMUNICATIONS	R	X	Y	Y	227	\$ 1,144	\$ 1,100	\$ 1,100	\$ 1,100	\$ 13,332
IA	359110	DALLAS COUNTY WIRELESS	R	X	Y	Y	71	\$ 396	\$ 411	\$ 411	\$ 411	\$ 4,887

UNIVERSAL SERVICE ADMINISTRATIVE COMPANY
Local Switching Support Projected by State by Study Area
Second Quarter 2011

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State	SAC	Study Area Name	Rural	Type	LSS	Certified	Working Loops	Monthly Support Amounts				Annual Total Support Amount
								Jan- Mar	Apr-Jun	Jul-Sep	Oct-Dec	
IA	359111	CLAY COUNTY COMMUNICATIONS	R	X	Y	Y	254	\$ 3,112	\$ 3,125	\$ 3,125	\$ 3,125	\$ 37,461
IA	359112	HOSPERS TELEPHONE COMPANY	R	X	Y	Y	93	\$ 456	\$ 477	\$ 477	\$ 477	\$ 5,661
IA	359113	SKYLINK, LC	R	X	N	Y	169	\$ 1,130	\$ 1,160	\$ 1,160	\$ 1,160	\$ 13,830
IA	359113	SKYLINK, LC	R	X	Y	Y	1,007	\$ 5,748	\$ 6,019	\$ 6,019	\$ 6,019	\$ 71,415
IA	359114	PREMIER WIRELESS, INC.	R	X	N	Y	1,316	\$ 6,135	\$ 6,479	\$ 6,479	\$ 6,479	\$ 76,716
IA	359114	PREMIER WIRELESS, INC.	R	X	Y	Y	1,436	\$ 9,229	\$ 9,873	\$ 9,873	\$ 9,873	\$ 116,544
IA	359117	TERRIL COMMUNICATIONS, LLC	R	X	Y	Y	44	\$ 540	\$ 577	\$ 577	\$ 577	\$ 6,813
IA	359118	C-M-L TEL COOPERATIVE ASSN	R	X	Y	Y	309	\$ 1,769	\$ 2,019	\$ 2,019	\$ 2,019	\$ 23,478
IA	359119	RINGSTED COMMUNICATIONS COMPANY	R	X	Y	Y	47	\$ 287	\$ 301	\$ 301	\$ 301	\$ 3,570
IA	359120	SCRANTON TELEPHONE COMPANY	R	X	Y	Y	34	\$ 295	\$ 279	\$ 279	\$ 279	\$ 3,396
IA	359121	LAKES AREA WIRELESS, L.C.	R	X	Y	Y	5	\$ 57	\$ 47	\$ 47	\$ 47	\$ 594
IA	359122	MINERVA VALLEY WIRELESS, INC.	R	X	Y	Y	240	\$ 1,264	\$ 1,259	\$ 1,259	\$ 1,259	\$ 15,123
IA	359124	SAC COUNTY MUTUAL TELEPHONE COMPANY	R	X	Y	Y	49	\$ -	\$ 285	\$ 285	\$ 285	\$ 2,565
IA	359125	PREMIER COMMUNICATIONS, INC.	R	X	N	N	1,655	\$ -	\$ 12,975	\$ 12,975	\$ 12,975	\$ 116,775

LEGEND:

R - Rural Carrier
N - Non-Rural Carrier

A - Average Schedule Incumbent
C - Cost Incumbent
X - Competitive

LSS Y - Eligible for LSS Support
N - Ineligible for LSS Support

Exhibit SMG-6

(Selected pages from Adak Eagle Enterprises Website detailing affiliates and inception date)

Source: <http://adaktu.net/index2.html>, access on April 9, 2011



Welcome to Adak Eagle Enterprises LLC

Serving Adak, Alaska since 2003, Adak Eagle Enterprises (AEE) has provided Adak with leading edge services allowing customers on the island a chance to keep communicating.

Whether you need to make a call using a home phone or cellular device, want access to the internet, or if you want to watch your favorite TV shows, we have what you need. Call us today!

Adak Eagle Enterprises LLC provides: Telephone, IPTV, Internet, and Cellular to the city of Adak, Alaska. The farthest western city in the United States, and has applied fresh technology to satisfy a rigorous need for bandwidth

management.

Due to the remote nature of Adak, which is located on the far end of the Aleutian Islands, the only internet uplink available is Satellite. On the Island of Adak, there historically has been an issue with utility customers sharing resources. AEE implemented a solution that not only maximizes the available bandwidth on the Satellite uplink but also limits the ability for customers to share their connectivity.



Proudly offering the following services to Adak

- **Windy City Cellular.** Quality cellular service at a competitive rate. Choose your plan and how you pay. We offer pre-paid plans to fit any need as well as contracts designed to accommodate any budget.
- **Windy City Broadband.** We have Internet plans available either day-by-day or month-to-month. Choose a plan to fit your time on Adak.
- **Adak Telephone Utility.** Our telephone services include residential lines, business lines, directory assistance, directory listing, voicemail, call forwarding, caller ID, call waiting, speed calling, intercom and many more.
- **Adak Cablevision.** We have all types of cable packages including 28 movie channels like Starz, Encore, and Showtime.

You can now make your payments online!

Payment Center

[Home](#) | [Web-based Email](#) | [About Us](#) | [Contact Us](#) | [Employment](#) | [Information Links](#) | [Photo Gallery](#) | [Payment Center](#) | [Products](#)
| [Telephone](#) | [Internet](#) | [Cellular](#) | [Cable TV](#)

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Contact Site Administrator [Here](#)

Exhibit SMG-7

(Excerpts from USF Local Switching Support by Study Area for Alaska:
4 Q 2010 Loop Counts)

Source: USAC Appendix HC08, 4Q 2014, accessed at
www.usac.org/about/governance/fcc-filings/2010/quarter-4.aspxra on April 8, 2011

UNIVERSAL SERVICE ADMINISTRATIVE COMPANY
 Local Switching Support Projected by State by Study Area
 Fourth Quarter 2010

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State	SAC	Study Area Name	Rural	Type	LSS	Certified	Working Loops
AK	610989	ADAK TEL UTILITY	R	C	Y	Y	165
AK	613001	ARCTIC SLOPE TEL	R	C	Y	Y	5,363
AK	613002	BETTLES TEL CO INC	R	C	Y	Y	202
AK	613003	BRISTOL BAY TEL COOP	R	C	Y	Y	1,631
AK	613004	BUSH-TELL INC.	R	C	Y	Y	1,016
AK	613005	CIRCLE UTILITIES	R	A	Y	Y	51
AK	613006	COPPER VALLEY TEL	R	C	Y	Y	4,798
AK	613007	CORDOVA TEL COOP	R	C	Y	Y	1,766
AK	613008	ACS-FAIRBANKS, INC.	R	C	Y	Y	26,666
AK	613010	ACS-N GLACIER STATE	R	C	Y	Y	44,106
AK	613011	INTERIOR TEL CO INC	R	C	Y	Y	7,812
AK	613012	ACS-AK JUNEAU	R	C	Y	Y	15,562
AK	613013	KETCHIKAN PUBLIC UT	R	C	Y	Y	7,708
AK	613015	MATANUSKA TEL ASSOC	R	C	Y	Y	52,718
AK	613016	MUKLUK TEL CO INC	R	C	Y	Y	3,523
AK	613017	ALASKA TEL CO	R	C	Y	Y	10,109
AK	613018	NUSHAGAK ELEC & TEL	R	C	Y	Y	2,399
AK	613019	OTZ TEL COOPERATIVE	R	C	Y	Y	3,645
AK	613020	ACS-N SITKA	R	C	Y	Y	11,028
AK	613022	ACS-AK GREATLAND	R	C	Y	Y	2,855
AK	613023	UNITED UTILITIES INC	R	C	Y	Y	11,925
AK	613025	YUKON TEL CO INC	R	C	Y	Y	538
AK	613026	NORTH COUNTRY TEL CO	R	A	Y	Y	171
AK	613028	SUMMIT TEL & TEL -AK	R	C	Y	Y	270
AK	619001	GCI COMMUNICATIONS CORP. - CL	R	X	N	Y	4,455
AK	619001	GCI COMMUNICATIONS CORP. - CL	R	X	Y	Y	93,860
AK	619003	MATANUSKA-KENAI, INC. - CL	R	X	Y	Y	14,848
AK	619004	DOBSON CELLULAR SYSTEMS, INC.	R	X	Y	Y	132,707
AK	619005	ALASKA COMMUNICATIONS SYSTEMS HOLDING, INC. - CL	R	X	Y	Y	71,694
AK	619006	COPPER VALLEY WIRELESS, INC. - CL	R	X	Y	Y	2,972
AK	619007	CORDOVA WIRELESS COMMUNICATIONS, INC. - CL	R	X	Y	Y	1,612
AK	619008	BRISTOL BAY CELLULAR PARTNERSHIP	R	X	Y	Y	2,022
AK	619010	ASTAC WIRELESS LLC - CL	R	X	Y	Y	1,257
AK	619011	OTZ TELECOMMUNICATIONS, INC.	R	X	Y	Y	983
AK	619012	WINDY CITY CELLULAR	R	X	Y	Y	49
AK	619013	TELALASKA CELLULAR, INC.	R	X	Y	N	439

Exhibit SMG-8

(USAC High Cost Disbursement Data for Adak Telephone Utility)

Source: USAC High Cost Disbursement Data Tool, accessed at
<http://www.usac.org/hc/tools/disbursements/default.aspx>, March 31, 2011

USAC

SPIN=Service Provider ID Number; HCL=High Cost Loop; HCM=High Cost Model; IAS=Interstate Access Support; ICLS=Interstate Common Line Support; LSS=Local Switching Support; LTS=Long Term Support; SNA=Safety Net Additive Support; SVS=Safety Valve Support.

High Cost Disbursement Data (Spin = ALL , Sac = 610989 , San = ALL , Year = ALL , Month = ALL , State = ALL)

This disbursement tool contains data from Jan 2003 through Feb 2011.

State	Spin	Study Area Code	Study Area Name	HCL	HCM	IAS	ICLS	LSS	LTS	SNA	SVS	Year	Month
AK	143030419	610989	ADAK TEL UTILITY	\$98,678	\$0	\$0	\$60,040	\$35,501	\$0	\$0	\$0	2011	Feb
AK	143030419	610989	ADAK TEL UTILITY	\$98,702	\$0	\$0	\$60,040	\$35,501	\$0	\$0	\$0	2011	Jan
AK	143030419	610989	ADAK TEL UTILITY	\$114,536	\$0	\$0	\$112,963	\$32,328	\$0	\$0	\$0	2010	Dec
AK	143030419	610989	ADAK TEL UTILITY	\$114,536	\$0	\$0	\$112,963	\$32,328	\$0	\$0	\$0	2010	Nov
AK	143030419	610989	ADAK TEL UTILITY	\$114,656	\$0	\$0	\$112,963	\$32,328	\$0	\$0	\$0	2010	Oct
AK	143030419	610989	ADAK TEL UTILITY	\$114,536	\$0	\$0	\$112,963	\$32,328	\$0	\$0	\$0	2010	Sep
AK	143030419	610989	ADAK TEL UTILITY	\$114,536	\$0	\$0	\$112,963	\$32,328	\$0	\$0	\$0	2010	Aug
AK	143030419	610989	ADAK TEL UTILITY	\$114,539	\$0	\$0	\$112,963	\$32,328	\$0	\$0	\$0	2010	Jul
AK	143030419	610989	ADAK TEL UTILITY	\$114,536	\$0	\$0	\$53,802	\$32,328	\$0	\$0	\$0	2010	Jun
AK	143030419	610989	ADAK TEL UTILITY	\$44,900	\$0	\$0	\$53,802	\$31,260	\$0	\$0	\$0	2010	May
AK	143030419	610989	ADAK TEL UTILITY	\$114,092	\$0	\$0	\$53,802	\$124,500	\$0	\$0	\$0	2010	Apr
AK	143030419	610989	ADAK TEL UTILITY	\$114,687	\$0	\$0	\$53,802	\$32,328	\$0	\$0	\$0	2010	Mar
AK	143030419	610989	ADAK TEL UTILITY	\$114,687	\$0	\$0	\$53,802	\$32,328	\$0	\$0	\$0	2010	Feb
AK	143030419	610989	ADAK TEL UTILITY	\$114,687	\$0	\$0	\$53,802	\$32,328	\$0	\$0	\$0	2010	Jan
AK	143030419	610989	ADAK TEL UTILITY	\$115,320	\$0	\$0	\$100,590	\$28,008	\$0	\$0	\$0	2009	Dec
AK	143030419	610989	ADAK TEL UTILITY	\$115,320	\$0	\$0	\$100,590	\$28,008	\$0	\$0	\$0	2009	Nov
AK	143030419	610989	Adak Tel Utility	\$115,341	\$0	\$0	\$100,592	\$28,008	\$0	\$0	\$0	2009	Oct
AK	143030419	610989	Adak Tel Utility	\$115,319	\$0	\$0	\$100,592	\$28,008	\$0	\$0	\$0	2009	Sep
AK	143030419	610989	Adak Tel Utility	\$115,319	\$0	\$0	\$100,592	\$28,008	\$0	\$0	\$0	2009	Aug
AK	143030419	610989	Adak Tel Utility	\$115,307	\$0	\$0	\$100,592	\$28,008	\$0	\$0	\$0	2009	Jul
AK	143030419	610989	Adak Tel Utility	\$114,585	\$0	\$0	\$36,022	\$28,008	\$0	\$0	\$0	2009	Jun
AK	143030419	610989	Adak Tel Utility	\$114,585	\$0	\$0	\$36,022	\$28,008	\$0	\$0	\$0	2009	May
AK	143030419	610989	Adak Tel Utility	\$114,495	\$0	\$0	\$36,022	\$179,052	\$0	\$0	\$0	2009	Apr
AK	143030419	610989	Adak Tel Utility	\$114,619	\$0	\$0	\$36,022	\$28,008	\$0	\$0	\$0	2009	Mar
AK	143030419	610989	Adak Tel Utility	\$114,619	\$0	\$0	\$36,022	\$28,008	\$0	(\$406)	\$0	2009	Feb
AK	143030419	610989	Adak Tel Utility	\$114,631	\$0	\$0	\$36,022	\$28,008	\$0	\$406	\$0	2009	Jan
AK	143030419	610989	Adak Tel Utility	\$76,181	\$0	\$0	\$61,798	\$24,906	\$0	\$0	\$0	2008	Dec
AK	143030419	610989	Adak Tel Utility	\$76,161	\$0	\$0	\$61,798	\$24,906	\$0	\$0	\$0	2008	Nov
AK	143030419	610989	Adak Tel Utility	\$313,195	\$0	\$0	\$61,798	\$24,906	\$0	\$0	\$0	2008	Oct

AK	143030419	610989	Adak Tel Utility	\$76,183	\$0	\$0	\$61,798	\$24,906	\$0	\$0	\$0	2008	Sep
AK	143030419	610989	Adak Tel Utility	\$76,183	\$0	\$0	\$61,798	\$24,906	\$0	\$0	\$0	2008	Aug
AK	143030419	610989	Adak Tel Utility	\$76,195	\$0	\$0	\$61,798	\$24,906	\$0	\$0	\$0	2008	Jul
AK	143030419	610989	Adak Tel Utility	\$76,181	\$0	\$0	\$33,811	\$24,906	\$0	\$0	\$0	2008	Jun
AK	143030419	610989	Adak Tel Utility	\$76,181	\$0	\$0	\$33,811	\$24,906	\$0	\$0	\$0	2008	May
AK	143030419	610989	Adak Tel Utility	\$30,335	\$0	\$0	\$33,811	\$75,438	\$0	\$0	\$0	2008	Apr
AK	143030419	610989	Adak Tel Utility	\$76,211	\$0	\$0	\$33,811	\$24,906	\$0	\$0	\$0	2008	Mar
AK	143030419	610989	Adak Tel Utility	\$76,211	\$0	\$0	\$33,811	\$24,906	\$0	\$0	\$0	2008	Feb
AK	143030419	610989	Adak Tel Utility	\$15,263	\$0	\$0	\$33,811	\$24,906	\$0	\$0	\$0	2008	Jan
AK	143030419	610989	Adak Tel Utility	\$92,369	\$0	\$0	\$30,106	\$19,367	\$0	\$0	\$0	2007	Dec
AK	143030419	610989	Adak Tel Utility	\$92,369	\$0	\$0	\$30,106	\$19,367	\$0	\$0	\$0	2007	Nov
AK	143030419	610989	Adak Tel Utility	\$397,472	\$0	\$0	\$30,106	\$19,367	\$0	\$0	\$0	2007	Oct
AK	143030419	610989	Adak Tel Utility	\$89,366	\$0	\$0	\$30,106	\$19,367	\$0	\$0	\$0	2007	Sep
AK	143030419	610989	Adak Tel Utility	\$89,366	\$0	\$0	\$30,106	\$19,367	\$0	\$0	\$0	2007	Aug
AK	143030419	610989	Adak Tel Utility	\$93,464	\$0	\$0	\$30,106	\$19,367	\$0	\$0	\$0	2007	Jul
AK	143030419	610989	Adak Tel Utility	\$88,465	\$0	\$0	\$16,091	\$19,367	\$0	\$0	\$0	2007	Jun
AK	143030419	610989	Adak Tel Utility	\$88,465	\$0	\$0	\$16,091	\$19,367	\$0	\$0	\$0	2007	May
AK	143030419	610989	Adak Tel Utility	(\$115,010)	\$0	\$0	\$16,091	\$58,671	\$0	\$0	\$0	2007	Apr
AK	143030419	610989	Adak Tel Utility	\$80,034	\$0	\$0	\$16,091	\$19,367	\$0	\$0	\$0	2007	Mar
AK	143030419	610989	Adak Tel Utility	\$80,034	\$0	\$0	\$16,091	\$19,367	\$0	\$0	\$0	2007	Feb
AK	143030419	610989	Adak Tel Utility	\$162,642	\$0	\$0	\$16,091	\$19,367	\$0	\$0	\$0	2007	Jan
AK	143030419	610989	Adak Tel Utility	\$65,945	\$0	\$0	\$16,091	\$17,927	\$0	\$0	\$0	2006	Dec
AK	143030419	610989	Adak Tel Utility	\$65,945	\$0	\$0	\$16,091	\$17,927	\$0	\$0	\$0	2006	Nov
AK	143030419	610989	Adak Tel Utility	\$659,450	\$0	\$0	\$16,091	\$17,927	\$0	\$0	\$0	2006	Oct
AK	143030419	610989	Adak Tel Utility	\$0	\$0	\$0	\$16,091	\$17,927	\$0	\$0	\$0	2006	Sep
AK	143030419	610989	Adak Tel Utility	\$0	\$0	\$0	\$16,091	\$17,927	\$0	\$0	\$0	2006	Aug
AK	143030419	610989	Adak Tel Utility	\$0	\$0	\$0	\$16,091	\$17,927	\$0	\$0	\$0	2006	Jul
AK	143030419	610989	Adak Tel Utility	\$0	\$0	\$0	\$4,258	\$17,927	\$0	\$0	\$0	2006	Jun
AK	143030419	610989	Adak Tel Utility	\$0	\$0	\$0	\$4,258	\$17,927	\$0	\$0	\$0	2006	May
AK	143030419	610989	Adak Tel Utility	\$0	\$0	\$0	\$4,258	\$17,927	\$0	\$0	\$0	2006	Apr
AK	143030419	610989	Adak Tel Utility	\$0	\$0	\$0	\$4,258	\$17,927	\$0	\$0	\$0	2006	Mar
AK	143030419	610989	Adak Tel Utility	\$0	\$0	\$0	\$34,064	\$229,614	\$0	\$0	\$0	2006	Feb
AK	N/A	610989	Adak Tel Utility	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2006	Jan

[Return to Disbursement Data Search](#)

Exhibit SMG-9

(USAC High Cost Disbursement Data for Windy City Cellular)

Source: USAC High Cost Disbursement Data Tool, accessed at
<http://www.usac.org/hc/tools/disbursements/default.aspx>, March 31, 2011

USAC

SPIN=Service Provider ID Number; HCL=High Cost Loop; HCM=High Cost Model; IAS=Interstate Access Support; ICLS=Interstate Common Line Support; LSS=Local Switching Support; LTS=Long Term Support; SNA=Safety Net Additive Support; SVS=Safety Valve Support.

High Cost Disbursement Data (Spin = ALL , Sac = 619012 , San = ALL , Year = ALL , Month = ALL , State = ALL)

This disbursement tool contains data from Jan 2003 through Feb 2011.

\$151,645

State	Spin	Study Area Code	Study Area Name	HCL	HCM	IAS	ICLS	LSS	LTS	SNA	SVS	Year	Month
AK	143033143	619012	Windy City Cellular	\$68,617	\$0	\$0	\$42,209	\$24,686	\$0	\$0	\$0	2011	Feb
AK	143033143	619012	Windy City Cellular	\$68,608	\$0	\$0	\$42,209	\$24,686	\$0	\$0	\$0	2011	Jan
AK	143033143	619012	Windy City Cellular	\$34,014	\$0	\$0	\$24,617	\$9,600	\$0	\$0	\$0	2010	Dec
AK	143033143	619012	Windy City Cellular	\$34,014	\$0	\$0	\$24,617	\$9,600	\$0	\$0	\$0	2010	Nov
AK	143033143	619012	Windy City Cellular	\$34,014	\$0	\$0	\$24,617	\$9,600	\$0	\$0	\$0	2010	Oct
AK	143033143	619012	Windy City Cellular	\$34,014	\$0	\$0	\$17,298	\$9,600	\$0	\$0	\$0	2010	Sep
AK	143033143	619012	Windy City Cellular	\$34,014	\$0	\$0	\$17,298	\$9,600	\$0	\$0	\$0	2010	Aug
AK	143033143	619012	Windy City Cellular	\$34,014	\$0	\$0	\$17,298	\$9,600	\$0	\$0	\$0	2010	Jul
AK	143033143	619012	Windy City Cellular	\$29,849	\$0	\$0	\$14,722	\$8,425	\$0	\$0	\$0	2010	Jun
AK	143033143	619012	Windy City Cellular	\$29,849	\$0	\$0	\$14,722	\$8,425	\$0	\$0	\$0	2010	May
AK	143033143	619012	Windy City Cellular	\$29,759	\$0	\$0	\$14,722	\$8,425	\$0	\$0	\$0	2010	Apr
AK	143033143	619012	Windy City Cellular	\$22,937	\$0	\$0	\$11,161	\$6,466	\$0	\$0	\$0	2010	Mar
AK	143033143	619012	Windy City Cellular	\$22,937	\$0	\$0	\$11,161	\$6,466	\$0	\$0	\$0	2010	Feb
AK	143033143	619012	Windy City Cellular	\$22,937	\$0	\$0	\$11,161	\$6,466	\$0	\$0	\$0	2010	Jan
AK	143033143	619012	Windy City Cellular	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2009	Dec
AK	143033143	619012	Windy City Cellular	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2009	Nov
AK	143033143	619012	Windy City Cellular	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2009	Oct
AK	143033143	619012	Windy City Cellular	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2009	Sep
AK	143033143	619012	Windy City Cellular	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2009	Aug
AK	143033143	619012	Windy City Cellular	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2009	Jul
AK	143033143	619012	Windy City Cellular	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2009	Jun
AK	143033143	619012	Windy City Cellular	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2009	May
AK	143033143	619012	Windy City Cellular	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2009	Apr
AK	143033143	619012	Windy City Cellular	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2009	Mar

[Return to Disbursement Data Search](#)

Exhibit SMG-10

(Windy City Cellular Price Schedules and Service Area)

Source: <http://adaktu.net/pdf/WCC%20APPLICATION.pdf> and
<http://adaktu.net/pdf/WCC%20Service%20Area.pdf>; Accessed April 9, 2011

WINDY CITY CELLULAR

Plans				Long Distance		Roaming		Texting/Data		Other					
Type	Minutes	Cost per Minute	Monthly Fee	In State		Out of State	In Network Cell to Cell	Roaming Minutes	Out of Network	SMS	Data Transmissions	Nights & Weekends	Additional minutes	Shared Lines Available	
	Emergency	20	0.5	\$10.00	Included	Included		Included	0	\$0.25	Not Available	Included	\$0.60	None	
Adak Smart Plan	Unlimited		\$20.00	Included	Included		Included	200	\$0.25	Included	Included	\$0.00	3		
Adak Smarter Plan	Unlimited		\$30.00	Included	Included		Included	600	\$0.25	Included	Included	\$0.00	3		
Adak Smartest Plan	Unlimited		\$50.00	Included	Included		Included	unlimited	\$0.00	Included	Included	\$0.00	3		
* Lifeline	Adak Smarter Plan \$30.00 minus discount of \$28.50 for a total pretaxed cost of \$1.50													\$0.00	None

Setup Fee: \$0.00 All plans

Shared Lines: \$5.00 per shared line on all plans
 Roaming: All roaming charges included in Monthly Fee
 Long Distance: All In-State LD included in Monthly Fee
 SMS/Data Included in Monthly Fee

AW 11/20/09

Exhibit SMG-11

(Adak TU Price Schedules and Service Area)

Source: <http://adaktu.net/pdf/ATU%20APPLICATION%20MASTER.pdf> and
<http://adaktu.net/pdf/ATU%20Service%20Area.pdf>. Accessed April 9, 2011



1410 Rudakof Circle Anchorage, AK 99508
Phone (907) 222-0844 Fax (907) 222-0845

**NEW/UPDATE CUSTOMER APPLICATION FOR:
ADAK TELEPHONE UTILITY**

Date: ____/____/____ **Main Billing Phone Number or Account Number:** _____

Legal/Account holder name: _____
(Last) (First) (Middle Initial)

Account type: ☐ Residential ☐ Business

Co-Account holder name (if business, owners name): _____

Physical Address/Location of Service: _____

Billing Address (Mailing Address): _____

Name(s) of other people authorized to make changes on this account: _____

APPLICANT INFORMATION

SSN # or Federal ID #:	Driver's License #:	State of Issue:	Date of Birth:
Employer Phone Number:		Employer Name & Address:	
Work Phone Number:		Cell Phone or Message Phone Number:	

CO-APPLICANT INFORMATION

SSN # or Federal ID #:	Driver's License #:	State of Issue:	Date of Birth:
Employer Phone Number:		Employer Name & Address:	
Work Phone Number:		Cell Phone or Message Phone Number:	

CREDIT CARD INFORMATION

<input type="checkbox"/> Visa <input type="checkbox"/> MasterCard		Credit Card Number:
Expiration Date:	CVR#: (3 digits located on the back of credit card)	Cardholder Signature:
PROCESSING OPTIONS FOR AUTO-PAY <input type="checkbox"/> 1 st of the month <input type="checkbox"/> 15 th of the month		<input type="checkbox"/> Bill to my credit card supplied above <input type="checkbox"/> Bill directly to the address above <input type="checkbox"/> Send a copy of bill if auto-pay <input type="checkbox"/> Do not send a copy of bill if auto-pay

CUSTOMER PROPRIETARY NETWORK INFORMATION ACCESS VERIFICATION (CPNI)

Password (Must be at least 6 characters including numbers, should not include easily identifiable biographical information.) [][][][][][]		Email Address:
What is your favorite Color?	What was your first car?	

Certification

I certify that the above information is true, accurate, and complete to the best of my belief and knowledge, and is voluntarily submitted for the purpose of receiving service from AEE or its subsidiaries. Further, I certify that I have the authority to establish an account in the name/s shown above and that I take full financial responsibility for this account.

Signature: _____ **Date:** _____

Co-Applicant Signature: _____ **Date:** _____

CS Rep Name: _____

ADAK TELEPHONE UTILITY

TELEPHONE SERVICE APPLICATION



1410 Rudakof Circle Anchorage, AK 99508
Phone (907) 222-0844 Fax (907) 222-0845

Date: ____/____/____

Applicant Name: _____
(Last) (First) (Middle Initial)

Location of Service: _____

TELEPHONE INITIAL COSTS

	RESIDENTIAL	BUSINESS
DEPOSIT	\$100.00	\$100.00
WORK ORDER	\$30.00	\$30.00
INSTALLATION	\$90.00	\$90.00

Please send the installation fee and deposit to our Anchorage office. When we receive the payment, we will issue a service order to our techs.

Monthly Access Charges***

<input type="checkbox"/> Residential <input type="checkbox"/> Business Single	<input type="checkbox"/> Business Multi-line <input type="checkbox"/> TAX EXEMPT
----------------------------------------------------------------------------------	-------------------------------------------------------------------------------------

Directory

<input type="checkbox"/> Listed <input type="checkbox"/> Business Directory Listing <input type="checkbox"/> Black Dot by name (Indicates no solicitation calls) <input type="checkbox"/> Additional Listings	<input type="checkbox"/> Non-published (Not in Directory or with Operator) <input type="checkbox"/> Non-Listed (Listed with Operator, Not in Directory) <input type="checkbox"/> DID Listing
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Custom Calling Features

Voice Mail <input type="checkbox"/> Residential \$6.00 <input type="checkbox"/> Business \$10.00 <input type="checkbox"/> Call Forwarding \$5.50	<input type="checkbox"/> Intercom \$3.25 <input type="checkbox"/> Caller ID \$7.50 <input type="checkbox"/> 3-Way Calling \$3.25 <input type="checkbox"/> Remote Call Forwarding \$11.50 <input type="checkbox"/> Call Waiting \$3.25	<input type="checkbox"/> Last Number Redial \$4.00 <input type="checkbox"/> Teen Service \$3.50 <input type="checkbox"/> Malicious Call Trap <input type="checkbox"/> Restricted Sent Paid \$2.50 <input type="checkbox"/> Teen Service with Voice Mail \$11.00
---------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Restricted Services

<input type="checkbox"/> Directory Assistance Deny \$1.50 – per line <input type="checkbox"/> Toll Restriction \$2.50	<input type="checkbox"/> 900 Toll Service Deny <input type="checkbox"/> Toll Controller with PIN per line \$2.50
--------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------

Low Income Assistance – If qualified

<input type="checkbox"/> Link Up (Interest free for 1 year on payment schedule) <i>First \$60 – 50% or maximum of \$30.00</i> <i>Next \$60 to \$130 – 100% or maximum of \$70.00</i> <input type="checkbox"/> Lifeline – Subscriber Charge	<input type="checkbox"/> Lifeline Residential Assistance <input type="checkbox"/> Direct Inward Dialing Service <input type="checkbox"/> Line Hunt Overflow to a Directory No. \$6.00
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Hunt Services

<input type="checkbox"/> Multi-Line Hunt \$2.50	<input type="checkbox"/> Stop Hunt \$6.00
-------------------------------------------------	-------------------------------------------

Long Distance Provider *** Please check which carrier below that you want to become your long distance company.

Long distance provider is required or there will be a default to Toll Restriction at \$2.50 a month

IN STATE	OUT OF STATE	You MUST call the carrier to turn up long distance service!!!!
<input type="checkbox"/>	<input type="checkbox"/>	0288 AT&T Alascom: Business (1-800-955-9556) Residence: (1-800-252-7266)
<input type="checkbox"/>	<input type="checkbox"/>	0077 GCI Communication Corp. Business: (1-800-800-7754) Residence: (1-800-800-4800)
		Other

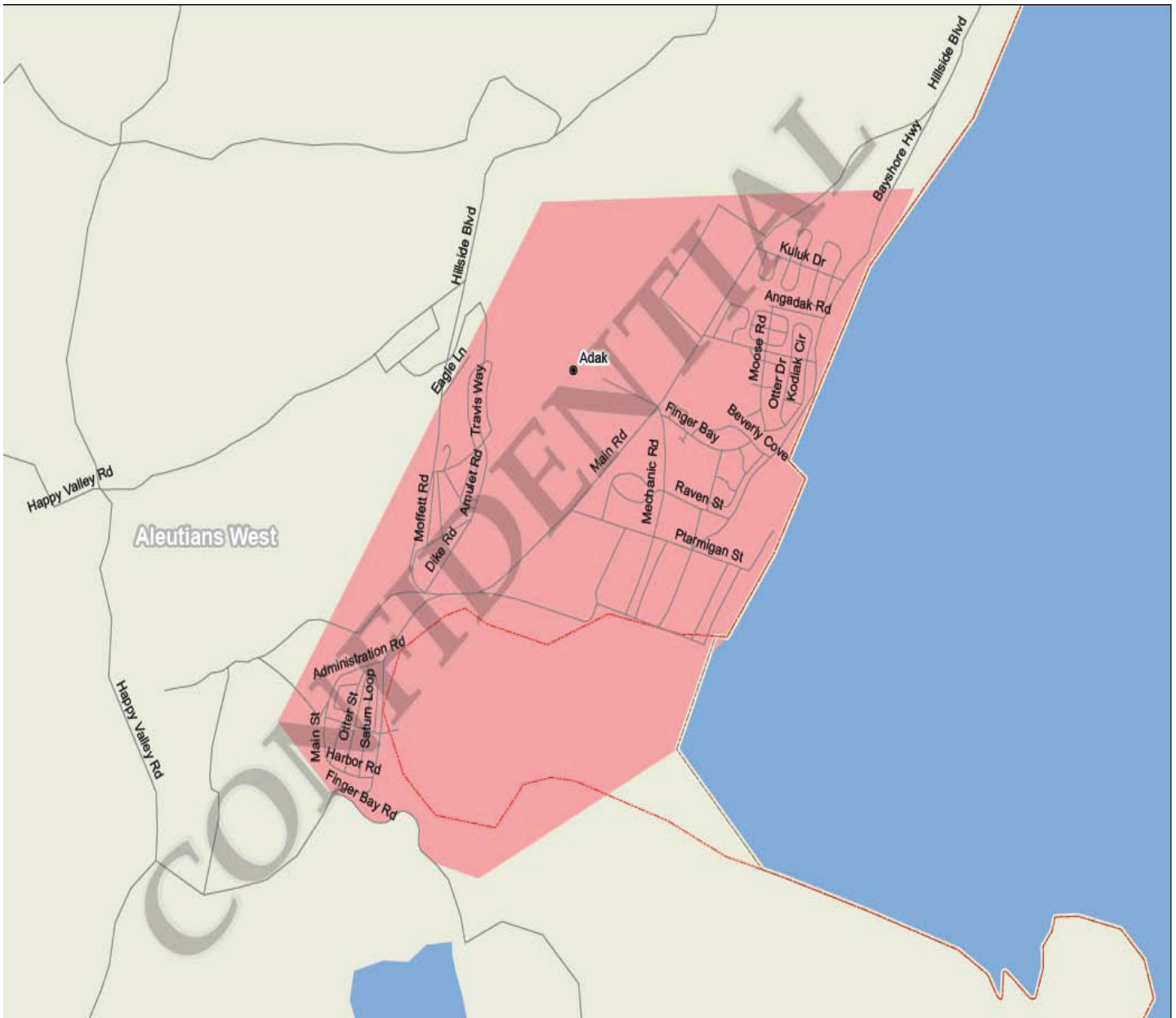
*** = Required Information

Telephone Service Fees:

Deposit per household/business \$100.00

(*Prices do not include tax and are subject to change)

Residential	Monthly	Directory Listing	Monthly
Residential First Line -----	\$40.60	Primary service listing -----	N/C
Residential End User -----	\$6.50	Each additional listings -----	\$1.50
Residential Universal -----	\$0.05	Non-published telephone number -----	\$1.50
Naf Surcharge -----	\$3.00	Non-listed telephone Number -----	\$1.50
911 Service Charge-----	\$2.50	Provision of directory listing to service providers	
		Annual Charge -----	\$342.00
Residential Second Line -----	\$29.76	Monthly Charge -----	\$28.50
Residential Second Line End User -----	\$6.50		
Residential Second Universal -----	\$0.05	Service order charge	Non-Recurring Fee
Naf Surcharge -----	\$3.00	Initial work order for telephone service -----	\$30.00
911 Service Charge-----	\$2.50	Subsequent work, adding or changing service ----	\$16.00
		Central office line connection charge -----	\$30.00
Business	Monthly	<i>per line or per number</i>	
Single Business Line -----	\$53.60	Facilities charge per line -----	\$60.00
Single Business End User -----	\$6.50	Dishonored check -----	\$25.00
Single Business Line Universal -----	\$0.05	Non-pay reconnect charge -----	\$50.00
Naf Surcharge -----	\$3.00	On-site service repair -----	\$150.00/hour
911 Service Charge-----	\$2.50	Move on phone/requesting a designated number	\$50.00
		Late fee, any invoice not paid within 25 days	0.88%
Multi Business Line -----	\$53.60	Universal Surcharge	
Multi Business End User -----	\$9.20	Residential/Single line business -----	\$0.05
Multi Business Line Universal -----	\$0.10	Multi business -----	\$0.10
Naf Surcharge -----	\$3.00	Installation / New connection -----	\$90.00
911 Service Charge-----	\$2.50		
		Telephone Tax Summary	Monthly
Business Data Line -----	\$28.60	Alaska Universal Service Fund -----	1.32%
Multi Business End User -----	\$9.20	Local Regulatory Cost -----	1.41%
Multi Business Line Universal -----	\$0.10	City Sales Tax -----	4.00%
Naf Surcharge -----	\$3.00	Federal Excise Tax -----	3.00%
911 Service Charge-----	\$2.50	FUSC Surcharge (applied to End User Fee)-----	0%
Directory Assistance	Per Message Inquiry		
After application of free call allowance	\$0.60		



Service Area Adak, Alaska 99546

March 31,2010

Exhibit SMG-12

(T7000 Switch References, Adak Telephone Utility and Palmer Mutual Telephone Company)

Source: Adak Telephone Utility: <http://adaktu.net/aboutus.html>, Palmer Mutual: <http://palemerone.com/about.htm>



About Us



Summary: Adak Eagle Enterprises, LLC dba Adak Telephone Utility started in October 2003. The company is a minority owned company currently doing business on the island of Adak, Alaska. Adak Island is part of the Aleutian chain and serves as a single exchange for Adak Island. The company is headquartered in Anchorage, Alaska, which is approximately 1,200 miles east of Adak Island. Adak Island was used by the US military from the 1940's until it was shut down as part of the base reassignment and closures in 1996.

While Adak was under Navy control, all telecommunications were under the Navy's control as well. The Regulatory Commission of Alaska (RCA) and Alaska Public Utilities Commission never certified the area. No other local exchange carrier provides or ever provided service to Adak. Two carriers, GCI and AT&T Alascom presently provide inter-and intra-state telecommunication services on Adak, via Satellite. Although the facilities originally were built to serve Navy requirements, both companies continue, and have committed to continue, long distance service to the island of Adak.

Adak Eagle Enterprises' provides all of the telecommunications including IP TV and broadband services on Adak Island. AEE in November 2006 replaced all copper facilities with Fiber Optic to the premise, central office.

AT&T Alascom Satellite earth station and GCI's satellite earth station provide Satellite delivery of the telecommunications traffic to Anchorage and is the only active route off of the Island. On November 11th, 2006 AEE's new T-7000 switch replaced the old PBX system the Navy left behind.

Adak Eagle Enterprises, LLC now provides leading edge ISP services to Adak, Alaska the farthest western city in the United States, and has applied fresh technology to satisfy a rigorous need for bandwidth management. Due to the remote nature of Adak, which is

located on the far end of the Aleutian Islands, the only internet uplink available is Satellite. On the Island of Adak, there historically has been an issue with utility customers sharing resources. AEE implemented a solution that not only maximizes the available bandwidth on the Satellite uplink but also limits the ability for customers to share their connectivity.

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PALMER MUTUAL
Telephone Company

306 Main street, PO Box 155

Palmer, IA 50571

p: 712.359.2411 | 800.685.7417

spam filter 
login

About US

Services

Directory

WebMAIL

Change
PASSWORD

City INFO

Contact US

Links

About Us

Employees

Steve Trimble,
General Manager

Deb Lenz,
Bookkeeper

Anita Vetter,
CSR

Board of Directors

President: Andy Lee Peterson
Vice-President: Alan Francis
Directors: Vern Metzger
Michael Plantz
Eldon Peters
Steve Gutz
Dan Stall

History

[Read about Palmer Telephone's Centennial celebration](#)

In 1900 Martin Hanson held the first telephone meetings in Palmer, Iowa, but it wasn't until February 1904 that the towns of Pomeroy and Palmer joined together to organize the Pomeroy-Palmer Mutual Telephone Company. In February 1906 the Company was incorporated.

Chas. Swalin served as the president of the company from 1906 until 1935. Other men who helped form the company were A.G. Quinn as vice president; John O'Brien as secretary; Rudolph Beneke as treasurer; and Chas. Skooglund as the general Manager. Shares were sold for \$50.00. Each member had a right to get a phone to his house for the price of one share. The very first share was issued to Mr. N.A. Blomstrand on April 3, 1906.

The following rules were attached to the company's By-laws:

1. In case of a call from central, all possible speed must be used to clear the line.
2. Before making a call, take down the receiver and see that the line is not in use.
3. Children should not be allowed to meddle with the phone.
4. When your signal is rung, you must take down the receiver and proceed with the conversation.
5. All conversations are limited to five minutes, except in a case of very pressing business.
6. All ordinary conversations must cease for business messages.

7. Anyone taking messages from the line when he or she is not called and circulating the same shall be suspended for a time from the use of the line.
8. By paying a fee of 10 cents, anyone not a member may have the use of this line and any other line with which the company has free exchange.
9. When a messenger is required, a fee of 10 cents and mileage will be allowed for this service. The messenger fee and toll must be collected by the party whose phone is used and must be turned over to the secretary on demand.
10. All conversations, including business, must cease on a call for a doctor.

Managers through the years have been: Chas. Skooglund (1906-1912); Peter Long (1913); W.H. Westphal (1914-1936); J. Howard Reeder (1937-1938); Rueben Blomberg (1939-1945); John Peterson (1946-1975); Gene Siefken (1975-2003); and Steve Trimble (2003-present).

One of the first operators was Miss Olive Babb. In 1909 operator service was available from 6 a.m.- 9 p.m. daily except on Sundays when it was 8 a.m. – 10 a.m. and 4:15 p.m.- 6:15 p.m. Miss Babb's monthly salary was \$32.00.

In March of 1932, after the bank closed with \$784.54 of the Company's money tied up, financial matters looked very bad. It was decided to continue on and hope for the best. With the help of a director's personal loan, the company operated as usual through the tough years.

The company's first central office was located across the street from the present office at 306 Main St. Improvements to the building were made through the years. In January 1919 the office was wired for electrical lights. In December of 1936, the old Farmers Savings Bank building was purchased from Dr. C.E. Stewert for \$3,000 and the company's office was moved into the upstairs rooms. The first floor was rented out for living quarters and then later to businesses which included a beauty shop, doctor's office and the post office. Since then, the company's office has remained at the same location but have moved down to the first level. Interior remodeling was completed in 1982 with the entire top floor removed. The last remodeling was done in 1992 to it's current layout.

Between the years of 1949-1956 due to the fact that Bell and Iowa Continental Companies were switching to dial, it was voted to release the customers in the Pomeroy and Pocahontas area who chose to receive dial service. With the territory changing it was decided on January 9, 1957 to change the company's name to Palmer Mutual Telephone Company with the business continuing on as usual.

In 1965 when a new automatic electric step-by-step switch costing \$36,500 was installed, it made it necessary to replace all of the hand crank telephones with the new dial telephones. The new switch also eliminated jobs of our switchboard operators. Helen Malm was our chief operator for 26 years. During those years some of her assistants were Matilda Behrens, Eleanor Siefken, Lena Arends, Olga Johnson, Mildred Van Hoveln, and Helen Ricklefs. Helen Ricklefs continued on as bookkeeper until 1975 when she resigned, and Pauline Schultz was hired to take her place. In 1978 Deanna Buddin was hired for part time office work. She stayed on until 1986 at which time Debra Lenz was hired to take her place.

The 70's brought many changes to the company. In 1971 long distance calling was made easier with the advent of direct distance dialing. A CAMA identifier was installed which enabled people to make long distance calls by dialing 1+ instead of going through the operator.

In 1975 John Peterson retired and Gene Siefken was promoted to general manager. Gene had been employed by the company since 1962 as a lineman.

In March 1975 a severe ice storm struck the area damaging rural lines and leaving many customers without service. Many hours were spent replacing poles and wire. As a result of this, the company applied for a loan to bury the outside plant. In 1977 a loan was granted by the Omaha Bank of Cooperatives for \$305,000. In 1978 cable was buried, additional line equipment installed in the central office, and the subscribers were switched to single party service.

In 1987, Palmer, along with most other independent companies in the state, purchased shares of stock in Iowa Network Services, Inc. INS gave small independent companies the benefits that only the larger companies had. By using a central switch in Des Moines, we were able to offer our customers the long distance carrier of their choice. This is known as equal access.

Because of the growing need of communication services, it was decided to build and operate a CATV system in the town of Palmer. With the help of other telephone companies, the cables were buried, equipment installed and the system was put into service in September 1990.

As the technology advanced it was decided to replace the step-by-step switch that was installed in 1965. So in 1992 this switch was replaced with a new digital switch at a cost of around \$200,000. This allowed the Palmer customers access to the newest features available.

1997 brought about the installation of fiber optic cable to replace the copper cable that

was being used to access the long distance network. This allowed the company to share in the network costs for telephone and CATV with the neighboring independent companies.

As the Internet became popular Palmer began offering dial-up access to the Internet through NetINS a subsidiary of INS in 1996. Following this the company began offering high speed internet service (DSL) through a neighboring independent in 2001.

In April of 2003 Palmer Mutual hired Steve Trimble as their General Manager replacing long time manager Gene Siefken. Beginning that summer Palmer Mutual began an upgrade to their CATV system to expand it to 860 MHz which allowed us to offer additional Digital and Hi-definition channels via a shared Head End. Of which we are now capable of over 200 channels.

2004 brought another busy year as Fiber Optic cable was installed going West of Palmer to alleviate some problem facilities. All together there was around Ten miles of Fiber installed along with one Fiber Cabinet to provide telephone and data services to those customers. While installing this fiber we continued on to the Exchange boundary with Iowa Telecom for a future fiber lease.

At the end of 2005 Palmer Mutual began considering replacing the Mitel GX5000 switch that was installed in January of 1992. Palmer Mutual went in with six other companies to negotiate a group pricing for a new Soft Switch. By the end of December we had accepted the bid from TAQUA for a T7000 Soft Switch at a cost of \$160,000. By July we had moved all of our Town subscribers to the new switch with the rural customers to follow at a later date.

Late in 2006 Palmer Mutual began to design additional Fiber Optic cable placement to upgrade our rural plant facilities. This would allow us to reach all of our rural customers with the features of our new TAQUA switch and to have access to our High Speed Internet (DSL). In the spring of 2007 Palmer Mutual selected Schoon's Construction out of Cherokee to install Fourteen miles of fiber Optic cable during the summer of 2007.

After the fiber was installed in the summer of 2007 we began the process of requesting bids from vendors for the electronics that would go on this Fiber Optic cable. By March of 2008 we had selected CALIX as our electronics provider and by October of 2008 we had cutover all of our rural customers to this equipment. This now gave all of our customers' access to our newest features and DSL services. All total this project ran close to \$500,000.

Another project for 2007 was the construction of Kossuth, Palo Alto and Pocahontas counties for wireless services through our joint venture with six other companies to offer wireless cellular services in these counties.

Another wireless venture was started in January 2009 for the counties of Dickenson and Emmett. This one Palmer Mutual joined fourteen other companies to begin offering the wireless service.

In January 2010 our long time employee Pauline Schultz retired. Current Employees and directors are listed.

Steve Trimble - General Manager
Deb Lenz - Bookkeeper
Anita Vetter - CSR
Vern Metzger - President
Andy lee Peterson - Vice President
Michael Plantz - Director
Eldon Peters - Director
Steve Gutz - Director
Dan Stall - Director
Alan Francis - Director

Currently Palmer Mutual Telephone Company has around 260 access lines with 67 CATV accounts, and 126 DSL accounts.

[Read about Palmer Telephone's Centennial celebration](#)

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Palmer Mutual Telephone Company, 306 Main Street, PO Box 155, Palmer, Iowa 50571 USA
[PalmerOne.com](#) | 712-359-2411 | 800-685-7417 | FAX: 712-359-2200 | palmerone@PalmerOne.com
For technical questions, e-mail tech@ncn.net

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Exhibit SMG-13

(Excerpts from Spreadsheet of NECA Cost Company Local Switching Cost Studies: 2009)

Source: FCC Wireline Competition Bureau file “LSS Cost Data 2005 – 2009.xls”
access at www.fcc.gov/wcb/iatc/NECA.html

Exchange Carrier Study Area Code (010)	Exchange Carrier Study Area Name (020)	Data Period (023)	Category 1.3 Loops (050)	1996 Interstate Unweighted DEM Factor (060)	1996 DEM Weighting Factor (070)	Account 2210 - Cat 3 (115)	Account 6210 (340)	Account 6560 - Switching (470)
-------------------------------------------------	-------------------------------------------	-------------------------	--------------------------------	---------------------------------------------------------	------------------------------------------	-------------------------------	-----------------------	-----------------------------------

452171	ARIZONA TELEPHONE CO	2009	3295	0.372529	3	4,173,404	121557	228730
452173	TOHONO O'ODHAM UTIL.	2009	3925	0.137798	3	2,872,597	320711	146735
452174	SOUTHWESTERN TEL CO	2009	3629	0.500025	3	2,098,892	122238	59360
452179	GILA RIVER TELECOM.	2009	4030	0.148114	3	2,009,627	893486	370271

Exhibit SMG-14

(Excerpts from USF Local Switching Support by Study Area for Arizona:
4 Q 2009)

Source: USAC Appendix HC08, 4Q 2009, accessed at
www.usac.org/about/governance/fcc-filings/2009/quarter-4.aspxra on April 8, 201.1

UNIVERSAL SERVICE ADMINISTRATIVE COMPANY
Local Switching Support Projected by State by Study Area
Fourth Quarter 2009

Appendix HC08
4Q2009
Page 1 of 1

State	SAC	Study Area Name	Rural	Type	LSS	Cert	Working Loops	Monthly Support Amounts				Annual Total Support Amount
								Jan- Mar	Apr-Jun	Jul-Sep	Oct-Dec	
AZ	450815	HOPI TELECOMMUNICATIONS COMPANY	R	C	Y	Y	1,768	\$10,451	\$10,451	\$10,451	\$10,451	\$125,412
AZ	452169	SAN CARLOS APACHE	R	C	Y	Y	2,717	\$26,017	\$26,017	\$26,017	\$26,017	\$312,204
AZ	452171	ARIZONA TELEPHONE CO	R	C	Y	Y	3,806	\$30,609	\$30,609	\$30,609	\$30,609	\$367,308
AZ	452173	TOHONO O'ODHAM UTIL.	R	C	Y	Y	4,050	\$17,308	\$17,308	\$17,308	\$17,308	\$207,696
AZ	452174	SOUTHWESTERN TEL CO	R	C	Y	Y	2,754	\$12,571	\$12,571	\$12,571	\$12,571	\$150,852
AZ	452176	VALLEY TEL COOP-AZ	R	C	Y	Y	7,572	\$94,832	\$94,832	\$94,832	\$94,832	\$1,137,984
AZ	452179	GILA RIVER TELECOM.	R	C	Y	Y	3,736	\$20,460	\$20,460	\$20,460	\$20,460	\$245,520
AZ	452191	ACCIPITER COMM.	R	C	Y	Y	346	\$7,944	\$7,944	\$7,944	\$7,944	\$95,328
AZ	452200	FORT MOJAVE TEL, INC	R	C	Y	Y	1,114	\$30,660	\$30,660	\$30,660	\$30,660	\$367,920
AZ	452226	MIDVALE-AZ	R	C	Y	Y	1,502	\$38,665	\$38,665	\$38,665	\$38,665	\$463,980
AZ	452302	VERIZON CALIF-AZ	R	C	Y	Y	7,115	\$30,797	\$30,797	\$30,797	\$30,797	\$369,564
AZ	453334	TABLE TOP TEL CO	R	C	Y	Y	4,301	\$65,762	\$65,762	\$65,762	\$65,762	\$789,144
AZ	454426	CITZENS-FRNTER-WH MT	R	C	Y	Y	37,664	\$96,590	\$96,590	\$96,590	\$96,590	\$1,159,080
AZ	454449	NAVAJO-AZ-FRONTIER	R	C	Y	Y	22,479	\$54,466	\$54,466	\$54,466	\$54,466	\$653,592
AZ	455101	QWEST CORP-AZ	N	C	N	N	1,877,440	\$0	\$0	\$0	\$0	\$0
AZ	457991	SADDLEBACK COMM CO	R	C	Y	Y	1,150	\$58,570	\$58,570	\$58,570	\$58,570	\$702,840
AZ	459001	SMITH BAGLEY, INC.	R	X	Y	Y	43,995	\$38,672	\$141,090	\$134,834	\$134,834	\$1,348,290
AZ	459002	SMITH BAGLEY, INC. (NON-RESERVATION)	R	X	Y	Y	8,260	\$0	\$23,114	\$21,183	\$21,183	\$196,440

Exhibit SMG-15

(Excerpts from NRRI State Regulation Summary re Regulation of Local Service)

Source: *State Retail Rate Regulation of Local Exchange Providers as of December 2006*, NRRI. Accessed at <http://nrri.org/pubs/telecommunications/07-04.pdf>



State Retail Rate Regulation of Local Exchange Providers as of December 2006

The National Regulatory Research Institute

April 2007

Lilia Pérez-Chavolla, Ph.D.
Research Associate

EXECUTIVE SUMMARY

The year 2006 saw significant changes in the retail rate regulation of the local exchange services provided by carriers (LECs) in the United States. Between October 2005 and December 2006, the period covered in this report, nine states adopted new state laws affecting the regulatory regimes of their local carriers; seventeen states reviewed or adopted new rate plans for one or more of their incumbents and eighteen states deregulated the rates of certain local exchange services, particularly bundled services and those provided in competitive urban areas.

The majority of states (33) apply some form of price cap regime to regulate one or more of their incumbent local exchange carriers (ILECs), especially their RBOCs. This number, however, has been decreasing since NRRI began this report in 2002, as more states move towards pricing flexibility and rate deregulation in response to regulatory findings of increased competition in their local telephone markets. Traditional rate-of-return regulation (ROR) is still used in 36 states, mostly to regulate their smallest, rural ILECs; of these, only five states still use this traditional form of regulation on all their incumbents. Eight states apply a mix of regimes to regulate their carriers, combining price cap regulation with ROR, rate flexibility or deregulation, especially for their smaller incumbents.

Meanwhile, larger incumbents have obtained, either through legislation or regulatory decisions, greater pricing flexibility and rate deregulation for an increased number of services; in some cases, the adoption of new state laws or new regulatory plans resulted in the elimination of all regulation of retail service rates, except for rates applicable to single-line basic exchange service. Legislatures or state commissions have granted complete pricing flexibility or rate deregulation to the largest incumbents in five states and in seven others, they have done so for all their ILECs. While last year only three states in the Qwest region had approved rate deregulation of all their ILECs, this year the trend reached Iowa, and entered the AT&T (TX) and Verizon's (RI) regions. The rates for stand-alone basic exchange services, which had remained regulated in most states until recently, are now beginning to be flexibly regulated in some states and scheduled to be deregulated in others. Based on statutes, rules, and AFOR plans now in place in several states, rate deregulation of *all* retail local exchange services provided by the largest incumbents or by all the ILECs in a state will be in effect in at least ten percent of the states by 2010.

Competitive local exchange carriers (CLECs) are also obtaining greater pricing flexibility in their markets. This year the number of states no longer reviewing CLEC rates surpassed that of those applying flexible regulation on their CLECs, with 25 and 21 states respectively. The remaining five states (Florida, Michigan, Mississippi, New Jersey, and Virginia) apply some form of rate regulation to specific CLECs' services.

This report includes six tables that provide different levels of detail about the regulatory regimes of local exchange carriers in the United States, both incumbent and competitive. For a summary, refer to Table 6 at the end of the report or to the different Figures.

07-04



Table 1
State Retail Rate Regulation of Local Exchange Carriers
(As of December 2006)

State	Large Incumbents	Other Incumbents	CLECs
DC	Verizon: <u>Price caps (2006)</u> . <u>Rate freeze</u> on residential dial tone until 12/31/05. Thereafter, VZ has the option of increasing the dial tone rate by 32¢. Rate would remain in effect for duration of plan. Other basic residential and business rates may be increased by up to 10% each year, but percentage revenue can't exceed annual inflation rate. Discretionary service rates <u>can rise</u> up to 15% annually, but percentage revenue can't exceed annual inflation rate. <u>Competitive services not rate regulated, but must be priced above incremental cost.</u>	No other incumbents.	<u>Rates not reviewed.</u>
FL	BellSouth, Verizon, Embarras: <u>Price caps (1995 statute)</u> . Indexed price caps (GDP-PI - 1%) for basic services. Rates for nonbasic services categories can be increased up to 6% per year in noncompetitive markets and up to 20% a year in competitive markets. A 2003 state law permitted major rate rebalancing to shift hundreds of millions of dollars from access charges onto local rates and allowed basic services to be regulated like others after two years (3 years for Sprint, now Embarras). PSC in Dec. 2003 approved plan to give the 3 companies \$344 million total in local rate increases.	<u>Price caps (1995)</u> . Can elect price cap regulation under program similar to large telcos. Six other incumbents have chosen price caps; only one small incumbent under <u>ROR</u> .	<u>Some rates reviewed.</u> CLECs providing both residential and single line business basic service are required to file price lists.
GA	BellSouth: <u>Price caps (1995)</u> . Indexed price caps (GDP-PI) for basic rates. Access charges <u>capped at interstate rate</u> . All other service rates <u>deregulated</u> .	<u>Price caps (1996)</u> . Can elect price cap regulation under program similar to BLS but without investment requirements. Of the 34 small incumbents, 9 remain under <u>ROR</u> ; the other 25 are under <u>price caps</u> .	<u>Rates regulated flexibly.</u>
HI	Hawaiian Telecom (formerly Verizon): <u>ROR</u> . State law requires cost-based and earnings-based regulation until PUC determines effective local competition exits.	No other incumbents	<u>Rates regulated flexibly.</u>
ID	Qwest, Verizon: <u>Nonindexed price caps</u> in basic local exchange under 5 lines. Annual rate increases limited to 10%. Caps scheduled to end in 2008. <u>Service deregulation (1989)</u> for all other retail services except basic local exchange provided to accounts with fewer than 5 lines.	<u>ROR</u> . Carriers have the option to petition for rate deregulation. Frontier has already petitioned for deregulation, which will become effective 3/1/2007. After this date Frontier will be under a price cap regime similar to that of Qwest and Verizon, with an expiration date of 2010. Mutual companies are not under PUC jurisdiction.	<u>Rates not reviewed.</u>

Table 1
State Retail Rate Regulation of Local Exchange Carriers
(As of December 2006)

State	Large Incumbents	Other Incumbents	CLECs
IA	<p>Qwest, Iowa Telecom Services, Frontier Communications of Iowa: <u>Rate deregulation (2005)</u>. Single-line flat-rated residential and business service rates under caps indexed to the annual percentage change in the GDP-PI as reported by the Federal government.</p> <p>In addition, rates can rise by \$1 per year for residential service or \$2 per year for business service up to a statewide cap of \$19 monthly for residential service and \$38 for business service until July 1, 2008. Other retail service rates are deregulated. Full rate deregulation allowed in any market where competitive alternatives exist.</p>	<p><u>Rate deregulation</u>. Rates and earnings deregulated since 1983. Companies must keep current tariffs on file and give notice of changes. Changes to other terms and conditions of service receive regulatory staff review and may be questioned.</p>	<p><u>Rates not reviewed</u>. CLEC local calling areas are supposed to coincide with incumbent's, but CLECs can petition for waiver.</p>
KS	<p>AT&T, Embark: <u>Price caps (1997) with rate deregulation (2006)</u> for all retail service bundles statewide, and all other stand-alone services in exchanges over 75,000 access lines, except for initial single-line residential basic exchange and the business basic exchange for customers with up to 4 lines.</p> <p>Deregulation can be extended to exchanges with fewer than 75,000 access lines, but companies will have to provide evidence that there are at least two competitive carriers, one of which must be facilities-based.</p>	<p><u>ROR</u>. Can file for price cap regulation and associated price deregulation.</p>	<p><u>Rates not reviewed</u>.</p>
KY	<p>BellSouth: <u>Rate deregulation (2006)</u>. Stand-alone, single-line basic exchange service rates frozen for 60 months after election of plan. After that, rates can rise according to applicable regulation for basic service on June 30, 2006, or a previously approved or new price regulation proposal for basic service. Deregulation of all other retail services.</p> <p>Cincinnati Bell: <u>Rate deregulation (2006)</u>. Stand-alone, single-line basic exchange service rates frozen for 60 months after election of plan. After that, rates can rise according to applicable regulation for basic service on June 30, 2006, or a previously approved or new price regulation proposal for basic service. Deregulation of all other retail services.</p> <p>Windstream: <u>Rate deregulation (2006)</u>. Stand-alone, single-line basic exchange service rates frozen for 60 months after election of plan. After that, rates can rise according to applicable regulation for basic service on June 30, 2006, or a previously approved or new price regulation proposal for basic service. Deregulation of all other retail services.</p>	<p><u>ROR</u>. 15 other incumbents have option to propose price caps or other alternatives to ROR. A 2006 state law also gave smaller incumbents the option of rate deregulation, but with only <u>one-year basic exchange rate freeze</u>.</p>	<p><u>Rates not reviewed</u></p>

Exhibit SMG-16

(Sample of Basic Telephone Rates in Texas)

Source: *Scope of Competition in Telecommunications Markets of Texas*, Report to the 82nd Texas Legislature, Public Utility Commission of Texas, January, 2011. Table 4 – Sample of Basic Telephone Service Rates in Texas.



**Report to the 82nd
Texas Legislature**

***Scope of Competition
in Telecommunications
Markets of Texas***

***Public Utility Commission of Texas
January 2011***

Table 4 – Sample of Basic Telephone Service Rates in Texas⁵⁵

<i>Serving Company</i>	<i>Major City/ Local Access Transport Area (LATA)</i>	<i>Exchange served</i>	<i>Basic Single Line Service Rates</i>		
			Residential	Business	Business Trunk
AT&T Texas – Chapter 65	Dallas/ Dallas LATA	Dallas Metropolitan Exchange-flexible	\$20.00	\$43.00	\$52.50
AT&T Texas – Chapter 65	Dallas/Dallas LATA	Dallas Metropolitan Exchange-fixed	\$18.05	n/a	n/a
AT&T Texas – Chapter 65	Donna/Brownsville LATA	Donna Exchange - flexible	\$19.00	\$39.75	\$48.25
AT&T Texas – Chapter 65	Donna/Brownsville LATA	Donna Exchange - fixed	\$16.10	n/a	n/a
AT&T Texas – Chapter 65	Ft. Davis/Midland LATA	Fort Davis Exchange	\$15.15	\$39.75	\$48.25
Verizon – Chapter 58/65	Gonzales/San Antonio LATA	Gonzales Exchange	\$12.10	\$29.60	\$43.95
Blossom Telephone Company – Chapter 52	Blossom/ Dallas LATA	Blossom Exchange	\$7.00	\$9.00	n/a
Eastex Telephone Coop – Chapter 52	Huxley – Houston LATA	Huxley Exchange	\$8.66	\$12.89	\$20.42
Verizon – Chapter 58/65	Tawakoni - Dallas LATA	Tawakoni Exchange	\$14.60	\$29.60	\$43.95
CenturyTel of Port Aransas - Chapter 59	Port Aransas – Corpus Christi LATA	Port Aransas Exchange	\$6.45	\$11.95	\$18.55

Over the next two years basic telephone service rates in exchanges served by the four largest incumbent telephone companies in the state are expected to continue to increase to offset the reduction in support received by these companies from the TUSF. To offset the reduced support, affected incumbent telephone companies may seek, under the terms of the Commission's order in Docket No. 34723, to gradually increase unbundled basic rates so that basic rates are within a range of \$15.50 to \$17 per month. This range was found to be reasonable by participating parties in Docket No. 34723.⁵⁶ Most of the competition in telephone services is in connection with wireless service and service packages from wireline companies that provide customers enhanced services like caller ID, unlimited long distance, or with bundled services, such as Internet or video. It seems clear that competition is strong in metropolitan areas for premium packages that

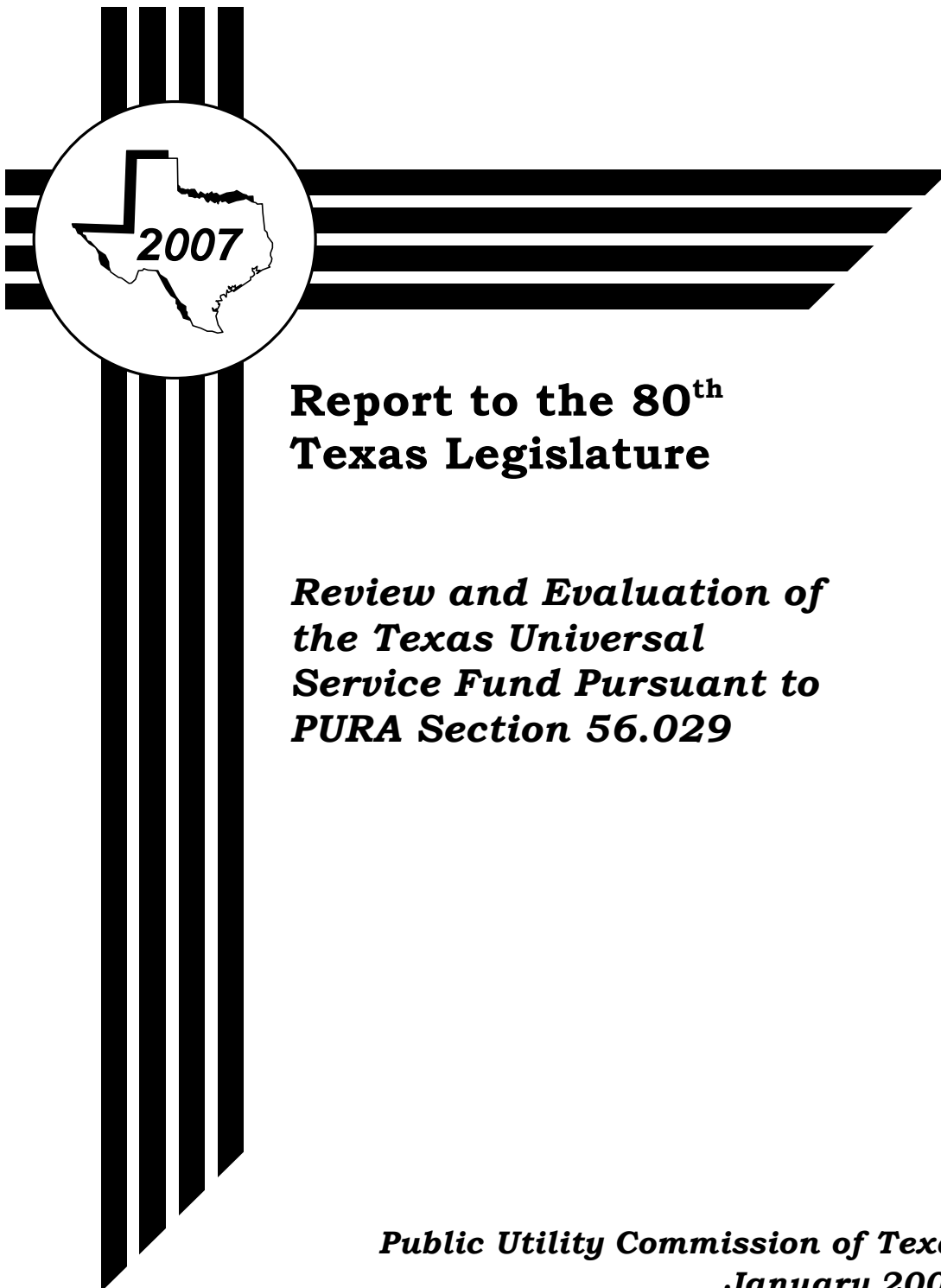
⁵⁵ Texas PUC tariff filings.

⁵⁶ *Petition for Review of Monthly Per Line Support Amounts from the Texas High Cost Universal Service Plan Pursuant to PURA § 56.031 and P.U.C. Subst. R. 26.403*, Docket No. 34723, Motion for Approval of the Unanimous Settlement Agreement (April 8, 2008).

Exhibit SMG-17

(Summary Pricing Data for Small Texas LECs)

Source: *Scope Review and Evaluation of the Texas Universal Service Fund Pursuant to PURA Section 56.029*, Report to the 80th Texas Legislature, Public Utility Commission of Texas, January, 2007. *Table 7 – Summary of Key Metrics – Small Companies.*



**Report to the 80th
Texas Legislature**

***Review and Evaluation of
the Texas Universal
Service Fund Pursuant to
PURA Section 56.029***

***Public Utility Commission of Texas
January 2007***

Table 7 — Summary of Key Metrics – Small Company

Name	Have BLTS Rates Increased Since 1999?	Do TOTAL Expenditures Exceed Receipts for CY 2000 - 2005?	Do <u>OPERATING</u> Expenditures Exceed Receipts for CY 2000 - 2005?	Do <u>CAPITAL</u> Expenditures Exceed Receipts for CY 2000 - 2005?	Residential Rates Per Line/mo (rounded)	Business rates Per Line/mo (rounded)	SRICUSP Receipts Per USF Line/mo – Dkt. 18516	Annual RECEIPTS (@ 1997 Access Line Counts) – Dkt. 18516	Intrastate Rate of Return - CY 2005 (or prior) ¹⁰³
Alenco	No	Yes	Yes	No	\$7 - \$11	\$14 - \$25	\$87	\$1,417,918	15.1%
Big Bend ¹⁰⁴	No	Yes	Yes	Yes	5 - 9	9 - 18	52	2,491,836	11.3%
Blossom	No	Yes	Yes	Yes	7	9	4	56,062	6.2%
Border	No	Yes	Yes	Yes	19	38	236	212,652	21.3%
Brazoria	No	Yes	Yes	Yes	10 - 14	18 - 22	31	2,031,754	12.0%
Brazos Inc.	No	Yes	Yes	No	6	10	37	501,746	21.6%
Brazos Tel.	No	Yes	Yes	Yes	7	18	12	518,851	10.1%
Cameron	Yes ¹⁰⁵	Yes	Yes	No	7 - 10	14 - 16	26	366,231	-0.4%
Cap Rock	Yes ¹⁰⁵	Yes	Yes	Yes	7 - 11	14 - 25	17	943,712	16.4%
Central Tx	No	Yes	Yes	Yes	8 - 12	11 - 35	23	1,739,870	7.3%
Century LD ¹⁰⁴	No	Yes	Yes	Yes	7	14	13	1,096,756	18.8%
Century PA ¹⁰⁴	No	Yes	Yes	Yes	6	11 - 12	13	497,880	16.1%
Century SM ¹⁰⁴	No	Yes	Yes	No	6	13	20	5,047,404	22.5%
Coleman	No	Yes	Yes	Yes	7	10	19	448,917	15.4%
Colorado	No	Yes	Yes	Yes	8	14	19	1,263,722	n/a
Comanche	No	Yes	Yes	Yes	10	14	8	464,680	-10.5%
Community	No	Yes	Yes	No	10	14	26	474,301	11.7%
Consol. TX ¹⁰⁴	No	Yes	Yes	No	6 - 8	13 - 15	12	10,991,391	25.1%
Consol. FB ¹⁰⁴	No	Yes	Yes	Yes	7 - 9	13 - 16	10	3,056,604	16.6%
Cumby	No	Yes	Yes	No	7	11	27	213,859	28.7%
Dell	No	Yes	Yes	Yes	15	21	46	302,481	0.0%
Eastex	No	Yes	Yes	Yes	6 - 7	10 - 11	14	4,178,106	3.1%
Electra	No	Yes	Yes	No	6	12 - 18	29	510,187	15.7%
ENMR	No	Yes	Yes	No	12 - 13	17 - 20	18	179,515	-7.0%
Etex	No	Yes	Yes	Yes	7	13 - 14	16	2,328,588	19.2%
Five Area	No	Yes	Yes	No	17	32 - 33	38	620,588	11.2%
Ganado	No	Yes	Yes	Yes	7 - 11	13 - 25	20	600,945	16.7%
Guadalupe ¹⁰⁶	No	Yes	Yes	Yes	7 - 8	11 - 18	12	3,782,715	16.9%
Hill Country	No	Yes	Yes	Yes	6	10	18	2,686,493	12.1%
Industry	No	Yes	Yes	Yes	8 - 9	12 - 14	35	755,887	1.0%
Kerrville ¹⁰⁴	No	Yes	Yes	Yes	7 - 8	16 - 20	11	2,283,730	20.9%
La Ward	Yes ¹⁰⁵	Yes	Yes	Yes	9	17	30	358,306	1.3%
L.Livingston	No	Yes	Yes	No	7	7	44	545,355	11.1%
Lipan	No	Yes	Yes	Yes	7 - 9	11 - 13	39	538,671	10.4%
Livingston	No	Yes	Yes	Yes	8	20	7	415,515	11.9%
Mid-Plains	No	Yes	Yes	Yes	7 - 14	18 - 27	15	510,042	12.5%
Nortex	No	Yes	Yes	No	8 - 9	15 - 17	34	1,246,463	19.5%
North Texas	No	Yes	Yes	No	9	17	11	108,163	-6.7%
Peoples	No	Yes	Yes	Yes	8 - 9	17 - 18	11	1,389,831	11.7%
Poka Lambro	No	Yes	Yes	No	9 - 10	16	44	1,661,915	-5.8%
Riviera	No	Yes	Yes	No	9	17	78	759,389	3.8%
Santa Rosa	No	Yes	Yes	Yes	8	12	14	367,802	6.7%
South Plains	No	Yes	Yes	Yes	8 - 11	12 - 17	16	860,582	13.9%
SW AR	No	Yes	Yes	Yes	18	33	5	27,522	-7.9%
SW Texas	No	Yes	Yes	No	8	14	39	1,611,976	20.6%
Sugar Land ¹⁰⁴	No	Yes	Yes	Yes	5 - 16	7 - 44	9	5,108,244	31.8%
Tatum	No	Yes	Yes	No	5	8 - 23	45	415,047	27.2%
Taylor	No	Yes	Yes	Yes	7 - 8	9 - 13	12	867,009	12.4%
TX Alltel ¹⁰⁴	No	Yes	Yes	Yes	5 - 6	11 - 16	13	3,886,302	12.8%
Valley	No	Yes	Yes	Yes	11 - 15	14 - 22	71	4,350,162	16.0%
West Plains	No	Yes	Yes	No	8	20	12	598,229	17.8%
West Texas	No	Yes	Yes	No	11	17	44	897,451	-3.9%
Wes-Tex	No	Yes	Yes	Yes	7 - 11	11 - 13	13	488,923	-16.0%
XIT	No	Yes	Yes	Yes	9 - 13	15 - 19	45	561,991	3.5%
TOTAL								\$79,640,271	

¹⁰³ Publicly available rates of return (ROR) from PUC Earnings Monitoring Reports. FCC's authorized ROR for non-price cap carriers is 11.25%.¹⁰⁴ Denotes Chapter 58 or 59 Incentive Regulation Election.¹⁰⁵ Denotes minor rate change (<=10% per yr) for cooperatives and small telephone companies pursuant to P.U.C SUBST. R. 26.171.¹⁰⁶ Denotes Certification for State-Issued Cable or Video Franchise.

Exhibit SMG-18

(USAC High Cost Disbursement Data for Blossom Telephone)

Source: USAC High Cost Disbursement Data Tool, accessed at
<http://www.usac.org/hc/tools/disbursements/default.aspx>, March 31, 2011

USAC

SPIN=Service Provider ID Number; HCL=High Cost Loop; HCM=High Cost Model; IAS=Interstate Access Support; ICLS=Interstate Common Line Support; LSS=Local Switching Support; LTS=Long Term Support; SNA=Safety Net Additive Support; SVS=Safety Valve Support.

High Cost Disbursement Data (Spin = ALL , Sac = ALL , San = Blossom% , Year = 2010 , Month = ALL , State = ALL)

This disbursement tool contains data from Jan 2003 through Feb 2011.

State	Spin	Study Area Code	Study Area Name	HCL	HCM	IAS	ICLS	LSS	LTS	SNA	SVS	Year	Month
TX	143002408	442038	BLOSSOM TEL CO	\$25,279	\$0	\$0	\$52,930	\$13,705	\$0	\$4,902	\$0	2010	Dec
TX	143002408	442038	BLOSSOM TEL CO	\$25,279	\$0	\$0	\$52,930	\$13,705	\$0	\$4,902	\$0	2010	Nov
TX	143002408	442038	BLOSSOM TEL CO	\$26,080	\$0	\$0	\$52,930	\$13,705	\$0	\$4,923	\$0	2010	Oct
TX	143002408	442038	BLOSSOM TEL CO	\$25,273	\$0	\$0	\$52,930	\$13,705	\$0	\$4,915	\$0	2010	Sep
TX	143002408	442038	BLOSSOM TEL CO	\$25,273	\$0	\$0	\$52,930	\$13,705	\$0	\$4,915	\$0	2010	Aug
TX	143002408	442038	BLOSSOM TEL CO	\$25,294	\$0	\$0	\$52,930	\$13,705	\$0	\$4,915	\$0	2010	Jul
TX	143002408	442038	BLOSSOM TEL CO	\$25,273	\$0	\$0	\$25,533	\$13,705	\$0	\$4,915	\$0	2010	Jun
TX	143002408	442038	BLOSSOM TEL CO	\$25,273	\$0	\$0	\$25,533	\$13,705	\$0	\$4,915	\$0	2010	May
TX	143002408	442038	BLOSSOM TEL CO	\$24,724	\$0	\$0	\$25,533	\$63,505	\$0	\$4,716	\$0	2010	Apr
TX	143002408	442038	BLOSSOM TEL CO	\$25,465	\$0	\$0	\$25,533	\$13,705	\$0	\$4,716	\$0	2010	Mar
TX	143002408	442038	BLOSSOM TEL CO	\$25,465	\$0	\$0	\$25,533	\$13,705	\$0	\$4,720	\$0	2010	Feb
TX	143002408	442038	BLOSSOM TEL CO	\$25,513	\$0	\$0	\$25,533	\$13,705	\$0	\$4,720	\$0	2010	Jan

[Return to Disbursement Data Search](#)

Exhibit SMG-19

(Price Cap LECs Interstate Rate of Returns: 2000 to 2008)

Source: *Trends in Telephone Service*, FCC WCB/IATD, September, 2010, Table 4.1
Accessed at <http://www.fcc.gov/wcb/iatd/trends.html>

Trends in Telephone Service



*Industry Analysis and Technology Division
Wireline Competition Bureau*

September 2010

This report is available for reference in the FCC's Information Center at 445 12th Street, S.W., Courtyard Level. Copies may be purchased by calling Best Copy and Printing, Inc., Portals II, 445 12th Street S.W., Room CY-B402, Washington DC 20554 at 800-378-3160, facsimile 202-488-5563, or via e-mail fcc@bcpiweb.com. The report can also be downloaded from the Wireline Competition Bureau Statistical Reports Internet site at: www.fcc.gov/web/iatd/trends.html.

Table 4.1
Interstate Rate of Return Summary *
Years 2000 through 2008
Price-Cap Companies Reporting FCC Form 492A
(Final Reports for 2000 Through 2007 and Initial Report for 2008) ¹

Reporting Entity		2008	2007	2006	2005	2004	2003	2002	2001	2000
AT&T, Inc.		¹¹								
1	BellSouth Telecommunications Inc		24.54 %	15.88 %	25.00 %	22.68 %	21.93 %	19.35 %	21.25 %	22.83 %
2	Ameritech Operating Companies		40.11	33.26	27.92	22.51	20.55	20.24	25.72	30.24
3	Nevada Bell Telephone Company		33.51	33.54	31.29	24.76	20.16	14.86	20.86	21.55
4	Pacific Bell Telephone Company		62.43	48.67	36.81	28.77	26.23	21.00	23.79	19.20
5	Southern New England Telephone Company, The		31.55	28.62	27.47	21.82 ⁶	23.93	18.47	23.57	18.21
6	Southwestern Bell Telephone Company L.P.		31.66	26.73	20.27	16.38 ⁶	15.60	14.88	18.81	15.17
7	Qwest Corporation, Including Malheur and El Paso	¹¹	52.56	41.97	28.60 ¹⁰	25.07	22.74	20.08	19.14	19.93
Verizon Telephone Companies		¹¹								
8	Verizon Telephone Companies (Verizon FCC Tariff No. 1 & No. 11)		19.89	16.55	18.37	11.24	8.00	11.95	12.93	13.36
9	Verizon California Inc. (California - GTCA)		39.60	32.18	27.89	34.99	29.17	28.50	28.48	25.87
10	Verizon California Inc. (Arizona - COAZ)		81.40	19.58	26.11	6.17	2.05	6.99	13.25	10.90
11	Verizon California Inc. (California - COCA)		85.67	54.32	40.93	36.93	30.64	28.22	29.80	28.74
12	Verizon California Inc. (Nevada - CONV)		47.81	39.12	27.98	28.79	28.51	24.08	26.66	28.82
13	Verizon Florida Inc. (Florida - GTFL)		30.16	31.59	32.25	28.96	24.46	22.03	29.23	21.90
14	Verizon North Inc. (COPA + COQS = COPT)		36.03	32.55	38.92	32.88 ⁶	40.74	43.61	39.71	41.05
15	Verizon North Inc. (Illinois - COIL)		48.90	42.82	41.27	41.72	60.34	54.09	53.67	44.51
16	Verizon North Inc. (Indiana - COIN)		70.42	54.82	51.36	40.36	47.34	46.06	46.55	47.67
17	Verizon North Inc. (Ohio - GTOH)		29.59	19.66	20.96	18.58	19.39	19.53	20.45	21.88
18	Verizon North Inc. (Pennsylvania - GTPA)		29.13	9.28	52.26	20.50	13.76	22.50	23.17	21.95
19	Verizon North Inc. (Wisconsin - GTWI)		21.76	17.16	13.86	11.53 ⁶	10.85	9.90	14.16	16.99
20	Verizon North/Verizon South (GTIN + GLIN = GAIN)		26.98	19.97	22.78	22.34	22.64	24.75	32.82	33.00
21	Verizon North/Contel South (GTMI + GLMI = GAMI)		23.38	20.00	17.88	14.83 ⁶	15.10	16.64	17.49	16.45
22	Verizon North/Verizon South (GTIL + GLIL = GAIL)		34.90	25.48	23.11	23.29	21.99	21.54	23.67	23.90
23	Verizon Northwest Inc. (Idaho - GTID)		68.31	47.61	43.93	34.53	28.20	33.01	38.74	34.17
24	Verizon Northwest Inc. (Oregon - GTOR)		29.30	29.05	32.43	25.44	26.28	26.10	31.69	30.95
25	Verizon Northwest Inc. (Washington - COWA)		47.16	39.13	33.53	30.44	36.20	31.57	40.06	39.49
26	Verizon Northwest Inc. (Washington - GTWA)		40.45	40.04	33.22	33.91	29.82	28.97	34.03	33.26
27	Verizon Northwest Inc. (West Coast CA - GNCA)		(7.20)	(1.59)	(33.59)	(9.44)	(13.80)	(5.17)	1.91	(8.35)
28	Verizon South Inc. (North Carolina - GTNC)		32.74	29.37	(27.32)	17.52	16.74	23.45	30.08	26.44
29	Verizon South Inc. (N. Carolina - CONC)		32.13	25.23	26.27	10.10	14.77	21.97	22.17	17.75
30	Verizon South Inc. (GTSC + COSC = GTST)		20.34	34.45	26.00	39.63	28.19	29.82	32.44	31.19
	Verizon South Inc. (Alabama - GTAL)								24.02	20.24
	Verizon South Inc. (Kentucky - COKY)								30.95	20.60
	Verizon South Inc. (Kentucky - GTKY)								27.21	25.07
31	Verizon South Inc. (Virginia - COVA)		52.93	50.02	46.88	33.50	39.52	40.41	40.69	40.85
32	Verizon South Inc. (Virginia - GTVA)		49.72	13.94	19.98	24.17	(22.01)	1.76	9.53	6.62
33	GTE Southwest Inc. dba Verizon Southwest (Texas - COTX)		18.13	13.33	11.09	11.23	10.05	12.46	11.9	12.17
34	GTE Southwest Inc. dba Verizon Southwest (Texas - GTTX)		21.36	16.33	18.38	18.21	18.74	20.47	24.35	21.65
	GTE Midwest Inc. (Missouri - COMO + COCM + COEM =COMT)								20.33	17.06
	GTE Midwest Inc. (Missouri - GTMO)								23.92	19.15
	GTE Systems of The South (Alabama - COAL)								15.77	14.93
Embarq										
35	Central Telephone Company - Nevada Division		59.46 %	47.08 %	53.49 % ⁸	53.49 % ⁸	45.80 %	43.37 % ⁶	34.16 %	23.80 %
36	Embarq - Florida Incorporated		31.46	33.54	40.43 ⁸	40.43 ⁸	43.03	40.98 ⁶	35.54	29.41
37	Embarq Local Telephone Cos. - Eastern (NJ & PA)		53.22	47.02	50.74 ⁸	50.74 ⁸	56.61	55.14 ⁶	45.38	37.78
38	Embarq Local Telephone Cos. - Midwest (MO, KS, MN, NE, WY, TX)		28.22	25.15	30.84 ⁸	30.84 ⁸	32.36	29.17 ⁶	25.24	18.89
39	Embarq Local Telephone Cos. - North Carolina		34.06	34.94	46.08 ⁸	46.08 ⁸	50.82	51.62 ⁶	45.89	36.64
40	Embarq Local Telephone Cos. - Northwest (OR & WA)		32.21	27.39	32.06 ⁸	32.06 ⁸	33.80	23.90 ⁶	33.51	34.62
41	Embarq Local Telephone Cos. - Southeast (TN, VA & SC)		37.57	34.91	40.98 ⁸	40.98 ⁸	38.35	36.14 ⁶	34.34	33.76
42	United Telephone Co. of Indiana, Inc.		55.12	58.90	64.24 ⁸	64.24 ⁸	71.95	68.80 ⁶	46.47	41.75
43	United Telephone Co. of Ohio		60.45	53.29	50.39 ⁸	50.39 ⁸	46.30	39.01 ⁶	31.50	30.89

Table 4.1
Interstate Rate of Return Summary *
Years 2000 through 2008
Price-Cap Companies Reporting FCC Form 492A
(Final Reports for 2000 Through 2007 and Initial Report for 2008) ¹

Reporting Entity	2008	2007	2006	2005	2004	2003	2002	2001	2000
All Other Companies									
44 CenturyTel of Belle-Hermann/So Missouri/Sw Missouri (CNMO)	23.24	17.20	26.29	30.75	22.94	14.53	4.69 ²		
46 CenturyTel of Northern Alabama (CNAN)	42.67	42.23	44.51	26.77	11.97	8.23	7.49 ³		
47 CenturyTel of Southern Alabama (CNAS)	43.83	41.26	39.47	32.36	23.21	24.13	15.78 ³		
48 Cincinnati Bell Telephone Company	72.35	56.54	47.98	53.10	33.71 ⁶	32.48	28.64 ⁴	30.09	28.95
49 Citizens Comms Cos. dba Citizens Comms FCC Tariff 1 (CTC1)	35.24	37.90	45.66	41.31	34.99 ⁶	24.40	19.27	15.73	19.68
50 Citizens Comms Cos. dba Citizens Comms FCC Tariff 2 (CTC2)	66.66	63.41	59.07	48.43	37.75 ⁶	16.14	20.67	17.30	24.05
51 Citizens Comms Cos. dba Citizens Comms FCC Tariff 3 (CTC3)	19.78	15.77	23.46	22.00	12.19 ⁶	10.40	8.94	4.52	16.12
52 Citizens Comms Cos. dba Citizens Comms FCC Tariff 4 (CTC4)	57.15	57.25	56.69	57.95	42.79 ⁶	35.38	23.31	13.08	30.94
53 Citizens Telecommunications Cos. (CTC5)	10.76					40.37	4.90	0.86	(11.23)
54 Consolidated Communications of Fort Bend Company	15.45								
55 Consolidated CommunicaTIONS OF Texas Company	25.09								
56 Frontier Telephone of Rochester	51.98	10.84	18.21	11.32	55.89 ⁶	10.67	11.47	12.32	18.91
57 Frontier Tier 2 Concurring Companies	35.45	48.89	51.56	59.64	11.45 ⁶	38.49	33.34	38.12	38.95
58 Frontier Comms of Minnesota & Frontier Comms of Iowa	16.31	33.41	34.90	47.18	33.67 ⁶	32.16	31.15	25.24	33.16
59 Hawaiian Telecom	23.43	21.43	22.41	21.88 ¹⁰	9.44 ⁷	16.96	15.30	16.72	17.87
60 Illinois Consolidated Telephone Company	38.89								
61 Iowa Telecom Service Group	35.15	28.05	25.51	19.36 ¹⁰	17.30 ⁶	17.58 ⁵	14.26 ⁴	13.07	
62 Iowa Telecom Systems Service Group		17.19	15.20	19.14 ¹⁰	20.16	23.97 ⁵	20.47 ⁴	18.45	
63 Micronesian Telecommunications Corp.	51.51	51.05	45.48	43.52	43.52 ^{6 7}	33.91	32.75	21.83	23.58
Windstream									
64 Georgia Properties	25.88								
65 Oklahoma Properties	41.37								
66 Texas Windstream, Inc	19.51								
67 Valor Oklahoma	17.69	30.33	(1.34) ⁹	19.38 ¹⁰	15.29 ⁶	8.69	9.31	11.65	11.22
68 Valor Texas	28.12	24.03	(1.13) ⁹	18.08 ¹⁰	13.47 ⁶	15.21	10.66	5.70	5.24
69 Valor New Mexico #1	30.73	22.84	11.60 ⁹	28.25 ¹⁰	22.96 ⁶	18.45	16.86	11.45	20.67
70 Valor New Mexico #2	25.72	21.64	5.54 ⁹	17.77 ¹⁰	21.16 ⁶	20.41	15.88	8.39	13.35
71 Windstream Alabama, LLC	31.19								
72 Windstream Arkansas, LLC	24.61								
73 Windstream Concord, Inc	39.50								
74 Windstream Florida, Inc	29.08								
75 Windstream Kentucky East, LLC Lexington	99.56	61.07	30.15 ⁹	38.10 ¹⁰	33.40 ⁶	26.75	27.78	12.57	12.99
76 Windstream Kentucky East, LLC London	31.26	22.87	14.12 ⁹	23.37 ¹⁰	25.50 ⁶	26.26	28.76		
77 Windstream Kentucky West, LLC	35.05								
78 Windstream Kerrville	41.96								
79 Windstream Missouri, Inc	24.78								
80 Windstream Mississippi, LLC	81.28								
81 Windstream Nebraska	53.55	24.89	23.87 ⁹	28.40 ¹⁰	14.25 ⁶	13.43	12.20	12.57	12.99
82 Windstream New York, Inc	56.59								
83 Windstream North Carolina, LLC	11.41								
84 Windstream Ohio	17.73								
85 Windstream Pennsylvania, LLC	16.57								
86 Windstream South Carolina, LLC	28.99								
87 Windstream Standard, LLC	33.33								
88 Windstream Sugar Land	31.79								
89 Windstream Western Reserve	25.25								
Maximum Rate of Return ¹¹	99.56 %	85.67 %	64.24 %	71.84 %	68.80 %	59.89 %	54.09 %	53.67 %	47.67 %
Minimum Rate of Return ¹¹	10.76	(7.20)	(1.59)	(33.60)	(9.44)	(17.50)	(5.17)	0.86	(11.23)
Weighted Arithmetic Mean ¹¹	32.16	30.65	25.51	23.48	20.44	18.06	17.69	19.62	18.04
Standard Deviation ¹¹	15.51	12.87	11.58	9.13	9.00	8.63	5.69	5.80	5.17

* The carriers' interstate rates of return reported on the FCC Form 492A may not agree with the interstate rates of return reported by the carriers on other Commission reports.

For example, price-cap carriers report interstate rates of return on the Commission's Automated Reporting Management Information System's (ARMIS) 43-01 report.

The 43-01 Report interstate rates of return also includes revenues and costs for non-price-cap services. See footnote 11 for additional information regarding the 43-01 Report.

¹ For years 1991 - 1999, see Industry Analysis Division, Common Carrier Bureau, *Trends in Telephone Service* (August 2001).

² For the reporting period 9/1/02 - 12/31/02.

³ For the reporting period 7/1/02 - 12/31/02.

⁴ For final 2002, there were no changes to the preliminary.

⁵ For final 2003, there were no changes to the preliminary.

⁶ For final 2004, there were no changes to the preliminary.

⁷ Verizon sold these entities in 2005.

⁸ In December 2004 Sprint and Nextel merged and in February 2006 the Local Telecommunication Division was named EMBARQ.

⁹ Windstream formed through spinoff of Alltel's landline business and merger with Valor Communications.

¹⁰ For final 2005, there were no changes to the preliminary.

¹¹ The Commission's *MO&O in Petition of AT&T For Forbearance*, WC Docket No. 07-21, et al, 23 FCC Rcd 7302 (2008), granted AT&T conditional forbearance from filing FCC 492A, the Rate of Return Monitoring Report, subject to approval of a compliance plan. On December 12, 2008, the Commission extended the same relief, subject to the same conditions, to Verizon and Qwest. On December 31, 2008, in a Public Notice, the Wireline Competition Bureau approved the three plans effective immediately. Therefore, the 2007 preliminary reported data will also be their final data. AT&T, Verizon, and Qwest entities will no longer file Report Form 492A for year 2008 and subsequent years.

Exhibit SMG-20

(USAC High Cost Disbursement Data Kentucky)

Source: USAC High Cost Disbursement Data Tool, accessed at
<http://www.usac.org/hc/tools/disbursements/default.aspx>, March 31, 2011

USAC

SPIN=Service Provider ID Number; HCL=High Cost Loop; HCM=High Cost Model; IAS=Interstate Access Support; ICLS=Interstate Common Line Support; LSS=Local Switching Support; LTS=Long Term Support; SNA=Safety Net Additive Support; SVS=Safety Valve Support.

High Cost Disbursement Data (Spin = ALL , Sac = 269690 , San = ALL , Year = 2008 , Month = ALL , State = KY)

This disbursement tool contains data from Jan 2003 through Feb 2011.

State	Spin	Study Area Code	Study Area Name	HCL	HCM	IAS	ICLS	LSS	LTS	SNA	SVS	Year	Month
KY	143001487	269690	KY ALLTEL-LEXINGTON	\$0	\$310,784	\$405,547	\$0	\$0	\$0	\$0	\$0	2008	Dec
KY	143001487	269690	KY ALLTEL-LEXINGTON	\$0	\$311,272	\$405,547	\$0	\$0	\$0	\$0	\$0	2008	Nov
KY	143001488	269690	KY ALLTEL-LEXINGTON	\$0	\$310,665	\$385,642	\$0	\$0	\$0	\$0	\$0	2008	Oct
KY	143001488	269690	KY ALLTEL-LEXINGTON	\$0	\$293,233	\$410,386	\$0	\$0	\$0	\$0	\$0	2008	Sep
KY	143001488	269690	KY ALLTEL-LEXINGTON	\$0	\$293,233	\$410,386	\$0	\$0	\$0	\$0	\$0	2008	Aug
KY	143001488	269690	KY ALLTEL-LEXINGTON	\$0	\$293,233	\$384,853	\$0	\$0	\$0	\$0	\$0	2008	Jul
KY	143001488	269690	KY ALLTEL-LEXINGTON	\$0	\$301,955	\$420,802	\$0	\$0	\$0	\$0	\$0	2008	Jun
KY	143001488	269690	KY ALLTEL-LEXINGTON	\$0	\$301,955	\$420,802	\$0	\$0	\$0	\$0	\$0	2008	May
KY	143001488	269690	KY ALLTEL-LEXINGTON	\$0	\$301,955	\$396,283	\$0	\$0	\$0	\$0	\$0	2008	Apr
KY	143001488	269690	KY ALLTEL-LEXINGTON	\$0	\$306,283	\$427,218	\$0	\$0	\$0	\$0	\$0	2008	Mar
KY	143001488	269690	KY ALLTEL-LEXINGTON	\$0	\$306,283	\$427,218	\$0	\$0	\$0	\$0	\$0	2008	Feb
KY	143001488	269690	KY ALLTEL-LEXINGTON	\$0	\$306,283	\$402,198	\$0	\$0	\$0	\$0	\$0	2008	Jan

[Return to Disbursement Data Search](#)

Exhibit SMG-21

(Trends in Average Interstate Access Per Minute Charges)

Source: Table 7.8 *Interstate Per-Minute Access Charges: National Average in Cents per Minute*, found in the 2010 Universal Service Monitoring Report, CC Docket No. 98-202. Accessed at <http://www.fcc.gov/wcb/iatd/monitor.html>

Table 7.8
Interstate Per-Minute Access Charges
(National Average in Cents per Minute)¹

Rates in Effect		Interstate Charges for Switched Access Service				
From	To	Carrier Common Line per Originating Access Minute ¹	Carrier Common Line per Terminating Access Minute ¹	Traffic Sensitive per Switched Minute	Non-Traffic Sensitive per Switched Minute ²	Total Charge per Conversation Minute ³
05/26/84	01/14/85	5.24 ¢	5.24 ¢	3.10 ¢		17.26 ¢
01/15/85	05/31/85	5.43	5.43	3.10		17.66
06/01/85	09/30/85	4.71	4.71	3.10		16.17
10/01/85	05/31/86	4.33	4.33	3.10		15.38
06/01/86	12/31/86	3.04	4.33	3.10		14.00
01/01/87	06/30/87	1.55	4.33	3.10		12.41
07/01/87	12/31/87	0.69	4.33	3.10		11.49
01/01/88	11/30/88	0.00	4.14	3.10		10.56
12/01/88	02/14/89	0.00	3.39	3.00		9.60
02/15/89	03/31/89	0.00	3.25	3.00		9.46
04/01/89	12/31/89	1.00	1.83	3.00		9.11
01/01/90	06/30/90	1.00	1.53	2.50		7.78
07/01/90	12/31/90	1.00	1.23	2.50		7.48
01/01/91	06/30/91	1.00	1.14	2.40		7.18
07/01/91	06/30/92	0.88	1.06	2.40		6.97
07/01/92	06/30/93	0.79	0.95	2.40		6.76
07/01/93	06/30/94	0.88	1.16	2.20		6.66
07/01/94	06/30/95	0.84	1.08	2.10	0.28 ¢	6.89
07/01/95	06/30/96	0.74	0.89	1.96	0.21	6.16
07/01/96	06/30/97	0.72	0.89	1.95	0.17	6.04
07/01/97	12/31/97	0.64	0.84	1.63	0.14	5.18
01/01/98	06/30/98	0.68	0.23	1.29	0.21	4.04
07/01/98	12/31/98	0.91	0.20	0.99	0.30	3.82
01/01/99	06/30/99	0.82	0.16	0.98	0.32	3.71
07/01/99	12/31/99	0.37	0.10	0.86	0.28	2.82
01/01/00	06/30/00	0.32	0.10	0.86	0.31	2.85
08/11/00	06/31/00 ⁴	0.23	0.07	0.52	0.26	1.91
07/01/01	12/31/01	0.15	0.07	0.48	0.24	1.71
01/01/02	06/30/02	0.15	0.07	0.47	0.24	1.69
07/01/02	06/30/03	0.02	0.01	0.48	0.22	1.46
07/01/03	06/30/04	0.00	0.00	0.48	0.22	1.44
07/01/04	06/30/05	0.00	0.00	0.50	0.25	1.53
07/01/05	06/30/06	0.00	0.00	0.52	0.25	1.59
07/01/06	06/30/07	0.01	0.00	0.54	0.25	1.63
07/01/07	06/30/08	0.01	0.00	0.56	0.26	1.71
07/01/08	06/30/09	0.01	0.00	0.63	0.24	1.80
07/01/09	06/30/10	0.00	0.00	0.64	0.26	1.85
07/01/10	06/30/11	0.00	0.00	0.67	0.27	1.92

¹ This table shows average rates (weighted by minutes of use) for all local exchange carriers (LECs) that file access tariffs subject to price-cap regulation and all LECs in the National Exchange Carrier Association (NECA) pool. The average rates reported here do not include revenues from subscriber line charges (SLCs) or primary interexchange carrier charges (PICCs), both of which are reported in Table 1.1. Effective 07/01/03, the carrier common line (CCL) rates for NECA carriers were eliminated.

² Non-traffic-sensitive charges include charges assessed on a per-month, per-unit basis. Prior to 07/01/94, these charges were included in the average traffic-sensitive rates.

³ The total charge per conversation minute consists of charges on the originating end of the call, which are adjusted for dialing and call setup time, plus charges on the terminating end. Originating charges per conversation minute equal the carrier common line charge per originating access minute plus the traffic-sensitive charge per switched minute, both multiplied by 1.07 to account for dialing and call setup time, plus the non-traffic-sensitive charge per switched minute. Terminating charges per conversation minute equal carrier common line charges per terminating access minute plus both traffic-sensitive and non-traffic-sensitive charges per switched minute.

⁴ Although the charges took effect on 7/1/2000, some companies made adjustments to the tariffs which did not take effect until 8/11/2000.

Source: Access tariff filings.

Exhibit SMG-22

(Interstate Access Per Minute Charges by Carrier)

Source: Table 1.4 *Interstate per Minute Access Charges by Carrier*, found in the FCC's *Trends in Telephone Service*, FCC WCB/IATD, September, 2010. Accessed at <http://www.fcc.gov/wcb/iatd/trends.html>

Trends in Telephone Service



*Industry Analysis and Technology Division
Wireline Competition Bureau*

September 2010

This report is available for reference in the FCC's Information Center at 445 12th Street, S.W., Courtyard Level. Copies may be purchased by calling Best Copy and Printing, Inc., Portals II, 445 12th Street S.W., Room CY-B402, Washington DC 20554 at 800-378-3160, facsimile 202-488-5563, or via e-mail fcc@bcpiweb.com. The report can also be downloaded from the Wireline Competition Bureau Statistical Reports Internet site at: www.fcc.gov/web/iatd/trends.html.

Table 1.4
Interstate Per-Minute Access Charges by Carrier
(In Cents per Minute) ¹

Company	Rates Effective from July 1, 2009 to June 30, 2010					Year 2008 Local Switching Minutes of Use (Millions)
	Carrier Common Line per Originating Access Minute	Carrier Common Line per Terminating Access Minute	Switched Traffic Sensitive per Access Minute	Switched Non-Traffic Sensitive per Access Minute ²	Total Charge per Conversation Minute ³	
ACS	0.00 ¢	0.00 ¢	0.56 ¢	0.12 ¢	1.39 ¢	236
América Móvil	0.00	0.00	0.90	0.22	2.29	2,029
AT&T	0.00	0.00	0.49	0.24	1.50	135,647
CenturyTel	0.01	0.00	0.85	0.21	2.18	20,102
Cincinnati Bell	0.00	0.00	0.66	0.55	2.47	2,170
Consolidated	0.00	0.00	1.33	0.35	3.46	456
FairPoint	0.00	0.00	0.51	0.28	1.62	3,421
Frontier	0.19	0.00	0.50	0.58	2.40	4,567
Hawaiian Telecom	0.00	0.00	0.63	0.38	2.06	996
Iowa Telecom	0.00	0.00	1.48	0.78	4.62	445
Pacific Telecom Inc.	0.00	0.00	0.49	0.17	1.35	48
Qwest	0.00	0.00	0.79	0.20	2.03	30,733
Verizon	0.00	0.00	0.55	0.26	1.64	86,668
Windstream	0.00	0.00	0.62	0.25	1.78	6,084
Price Caps	0.00	0.00	0.57	0.25	1.69	293,601
NECA	0.00	0.00	2.30	0.47	5.71	12,355
All Price Caps and NECA	0.00	0.00	0.64	0.26	1.85	305,956

¹ This table shows average rates (weighted by minutes of use) for all local exchange carriers (LECs) that file access tariffs subject to price-cap regulation and all LECs in the National Exchange Carrier Association (NECA) pool. Rates are composites of all regions and subsidiaries of each local exchange carrier. No information is available for those carriers that are not in the NECA pool, but are subject to rate-of-return regulation. The average rates reported here do not include the average revenue per minute from subscriber line charges (SLCs) or primary interexchange carrier charges (PICCs), both of which are reported in Table 1.1.

² Non-traffic sensitive charges include charges assessed on a per-month, per-unit basis.

³ The total charge per conversation minute consists of charges on the originating end of the call, which are adjusted for dialing and call setup time, plus charges on the terminating end. Originating charges per conversation minute equal the carrier common line charge per originating access minute plus the traffic-sensitive charge per switched minute, both multiplied by 1.07 to account for dialing and call setup time, plus the non-traffic-sensitive charge per switched minute. Terminating charges per conversation minute equal carrier common line charges per terminating access minute plus both traffic-sensitive and non-traffic-sensitive charges per switched minute.

Source: Access tariff filings.